

FEDERAL BUREAU OF INVESTIGATION  
FOI/PA  
DELETED PAGE INFORMATION SHEET  
FOI/PA# 1190819-0

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# Memorandum



To : SAC, WMFO (29B-WF-171994) (P)

Date 10/14/94

*[Handwritten signature]*  
From

SA

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Subject: HIDDEN INTERESTS;  
MC #38;  
FIF; FAG  
(OO: WMFO)

In order to better administrate the captioned matter, the following subfiles have been opened:

Sub A.....Outgoing Teletypes/Facsimiles - General  
Sub C.....1As  
Sub D.....FD-302s and Inserts  
Sub F.....Financial Matters  
Sub G.....National Bank of Georgia/BCCI  
Sub H.....Bulky Exhibit Forms (FD-192)  
Sub I..... et al  
Sub J.....Collection and Review of Records - BCCI  
Sub L.....Independence Bank/BCCI  
Sub M.....CentTrust/BCCI  
Sub N....."C-Chase"; "C-Chase II"  
Sub O.....Investigation by Federal Reserve System  
Sub P.....Press Coverage  
Sub Q.....Subpoenas  
Sub R.....Incoming Teletypes/Facsimiles - General  
Sub S.....Airtels - In/Out - General  
Sub T...../BCCI - All Other Banks  
Sub U..... et al  
Sub V..... et al  
Sub W.....Clifford &   
Sub AA.....CAPCOM/TCI  
Sub FS.....Forfeiture/Seizure  
Sub TS.....Top Secret  
Sub Fug 1.....  
Sub Fug 2.....  
Sub Fug 3.....  
Sub Fug 4.....

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37-WMFO  
(1-29B-WF-171994 Main)  
(1-Each Subfile)

(37)

*OPEN SUBFILE  
SUB JS  
[Signature]*

29B-WF-171994-

*[Handwritten marks and signatures]*

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29B-WF-171994

Sub BB.....Screening; Liquidation  
Sub CC.....Kerry Committee Matters  
Sub DD.....Lead Control  
Sub EE.....First American Corporation Civil Rico  
                    Suit (DCDC CA 93-1309)  
Sub FF.....BCCI, et al: Prosecution - D.C. RICO  
Sub GG.....Collection/Review of Records - [REDACTED]  
Sub HH.....Collection/Review of Records - CIA; NSA  
Sub II.....Law Enforcement Cooperation/Dissemination

opened: It is now recommended that the following subfile be

Sub JJ..... [REDACTED] et al, dba [REDACTED]  
                    [REDACTED]

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# Memorandum



To : SAC WMFO (29B-WF-171994) (P)

Date 8/12/92

From : SA [redacted]

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Subject: HIDDEN INTERESTS  
MAJOR CASE #38

For information, on 8/12/92 SA's [redacted] and [redacted] met with DOJ attorneys [redacted] and [redacted] regarding witness interviews. Listed below is an anticipated schedule of the first wave of witnesses to be interviewed:

1) 8/17/92 [redacted] and [redacted] These interviews are being setup by [redacted]

2) The week of 8/17/92, [redacted] This interview will be setup by [redacted]

3) 8/21/92, [redacted] and [redacted] These interviews were setup by [redacted]

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4) 8/24/92, [redacted] and [redacted] These interviews are being setup by [redacted]

5) 8/26/92, [redacted] and [redacted] AND [redacted] will be setup by SA [redacted] and [redacted] and [redacted] will be setup by [redacted]

6) 8/27/92, [redacted] This interview will be setup by [redacted]

8) 8/28/92, [redacted] and [redacted] These interviews will be setup by [redacted]

9) The week of 8/31/92, [redacted] This interview will be setup by [redacted]

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In addition to the above, SA [ ] will meet with SSA [ ] and setup a interview with [ ] This interview will be s setup for approximately 1/2 day sometime in early September 1992. Also, [ ] will review the NYGJ transcript re [ ] to determine if he should be interviewed.

There are additional interviews both overseas and in the USA which are being setup by [ ] TEAM 1 will be advised shortly concerning the specific dates of these interviews shortly.

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It is noted that TEAM 1 will prepare a calender that will reflect the interviews as they are setup. A duplicate calender will be prepared and maintained at DOJ by [ ] SA [ ] and [ ] will remain in contact to insure that there is coordination between DOJ and TEAM 1 regarding the witness interviews. The above calender will be maintained in the office of SA [ ] and will contain the date and time of the interview, and the name of the SA responsible for the pretrial interview. Any other TEAM 1 SA who wishes to attend the interview is welcome to attend and should coordinate with the appropriate SA.

It is further noted that the pretrial interviews should be joint efforts between the TEAM 1 SA and the DOJ attorney, but no interview notes should be taken by the SA and likewise no FD 302 prepared.

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## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 9/11/92

[redacted] was interviewed at the DEPARTMENT OF JUSTICE, 1400 New York Avenue, Northwest, Washington, D.C. Also present during the interview was [redacted] attorney, [redacted] and DOJ attorneys [redacted] and [redacted]. After being advised of the official identity of the interviewing agent and the nature of the interview, [redacted] provided the following information:

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[redacted] was shown a facsimile dated July 17, 1986 to [redacted] which he reviewed. [redacted] advised that he did associate the above facsimile with the shares to [redacted] and that it contains [redacted] writing in the margin. [redacted] stated that he wrote his comments in the margin inasmuch as there was a question as to where the shares were going to come from. [redacted] stated that he talked to [redacted] about this but that [redacted] was not asked to evaluate this. [redacted] advised that it was more being provided for his information and asking him for his reaction to it.

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[redacted] stated that there was no real reason for the Share Rights Offering being on July 25, 1986 and that this was the date appropriate for when the money was due from a shareholder. [redacted] stated that the Share Rights Documents were dated "as of" and that most were signed after July 25, 1986 and that some were not signed until much later. [redacted] stated that the Director's Resolutions were signed at the time by [redacted] and CLIFFORD and that some were signed by [redacted] much later and possibly as late as the spring of 1987. [redacted] stated that it took longer to get them to sign the documents because they were not located in Washington, D.C. and it was [redacted] responsibility to get the Resolution signed, but that he was busy on other things regarding FIRST AMERICAN BANK and the NATIONAL BANK OF GEORGIA. [redacted] stated that it was his feeling that it was not important to have the Director's Resolution signed before and it is possibly because CCAH was a shell corporation and really had no employees at all. [redacted] stated he had been told by [redacted] that all the directors approved of the Share Rights

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b7CInvestigation on 5/22, 6/2/92 at Washington, D.C.File # 29B-WF-171994 - Sub W XIby SA [redacted] Date dictated 6/8/92b6  
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Continuation of FD-302 of [REDACTED], On 5/22/92, Page 2

Offering and that he was not in a big hurry to have the Resolution signed.

[REDACTED] stated that he did talk to [REDACTED] over time about the fact that he had not received the documents back from the CCAH shareholders and that [REDACTED] would tell him to call [REDACTED] in order to get the documents forwarded. [REDACTED] stated that the documents were prepared prior to July 25, 1986. [REDACTED] stated that he did contact [REDACTED] and [REDACTED] and did send the documents to them directly.

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[REDACTED] was shown a copy of a facsimile dated July 25, 1986 to [REDACTED] which included a shareholder's list. [REDACTED] stated that [REDACTED] and that they were as of that date. [REDACTED] stated, in all probability, the documents were attached to the facsimile at that time. [REDACTED] stated that part of the [REDACTED] purchase was from the pooling of [REDACTED] shares and the shares had been sold to [REDACTED] over a short period of time. [REDACTED] stated that he was aware that, for a short period of time, [REDACTED] combined percentage ownership was over the limit and should have caused a report to the FED.

[REDACTED] stated that he did have a conversation about this with [REDACTED], and possibly [REDACTED]. [REDACTED] stated that in regards to [REDACTED], he mentioned to him that for a short period of time, [REDACTED] was over 10% owner and [REDACTED] response was that [REDACTED] was under 10% at the end of the Share Rights process, so there is no need to report his increased ownership share and did not see that as raising an issue as long as it was a short period of time. [REDACTED] stated that he told [REDACTED] about his discussion with [REDACTED] and he does not recall [REDACTED] reaction to the information and he does not know if [REDACTED] talked to [REDACTED].

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[REDACTED] stated he does not recall these issues being discussed with much frequency in June, but that more so in July which was a focus of concern. [REDACTED] stated that [REDACTED] definitely wanted [REDACTED] to talk to [REDACTED] about this situation. [REDACTED] stated he did not ask for [REDACTED] response in writing and he does not recall why he did not request it to be done in writing. [REDACTED] stated he does not recall there being any discussions that the 10% issue would hold up the Share Rights Offering. [REDACTED] stated that he gave the percentage share information to [REDACTED] and possibly [REDACTED] and that he thinks that he also sent the chart that he had prepared to both of them.

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Continuation of FD-302 of [REDACTED], On 5/22/92, Page 3

[REDACTED] stated that he received his information from [REDACTED] in July and possibly within a week of the issue being raised. [REDACTED] stated that he told [REDACTED] what [REDACTED] had said and that [REDACTED] had responded that that was fine and that he should continue working with the Rights Offering.

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[REDACTED] stated that he thinks he was advised by [REDACTED] over the phone and, subsequently by telex that they had received the \$150,000,000 from the shareholders. [REDACTED] stated that the money was to be held at BCCI overseas and that he does not know who decided that this would be the case but that he was told by [REDACTED] and [REDACTED] that this was where the money was to be held. [REDACTED] stated that the money was held in a CCAH subscription account with BCCI overseas. [REDACTED] stated that [REDACTED] had advised him that he needed documents authorizing the opening of an account by the CCAH shareholders. [REDACTED] stated he did talk to [REDACTED] about putting the funds into BCCI overseas and not FIRST AMERICAN BANK, but he does not recall any specific conversation but was probably told by [REDACTED] that the interest rate was more favorable with BCCI. [REDACTED] stated that the wire transfer function was possibly located at overseas and it was possibly why they put the funds in BCCI overseas. [REDACTED] stated that the treasury function for BCCI was in the Cayman Islands relating to the Western Hemisphere transactions. [REDACTED] stated at some point, he learned that BCCI overseas had a correspondent relationship with SECURITY PACIFIC BANK and money that came to the U.S.A. went through BCCI overseas to SECURITY PACIFIC BANK. [REDACTED] stated that he never did work on the BCCI treasury losses but recalls reading about them in 1985.

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[REDACTED] stated he had no recollection of [REDACTED] becoming involved in where the money would be placed. [REDACTED] stated that he had no reference to BCCI's preference that the funds be held in overseas and he thought the funds were coming from BCCI accounts of the shareholders to the BCCI overseas accounts. [REDACTED] stated there were conversations that the money would stay at BCCI overseas until CCAH needed the funds and that [REDACTED] would say when the funds needed to be used. [REDACTED] stated that, to his recollection, no one was tasked to decide the best place to place the \$150,000,000.

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[REDACTED] stated that he would expect, but that he has no personal knowledge, that advice regarding what CCAH should do

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Continuation of FD-302 of [REDACTED], On 5/22/92, Page 4

with the funds would be with BCCI inasmuch as they were financial advisors to the CCAH shareholders. [REDACTED] stated he does not know if [REDACTED] consulted FAB employees concerning any CCAH activity. [REDACTED] stated that later he would contact [REDACTED] about when the funds would be available to FAB.

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[REDACTED] stated that the purpose of the \$150,000,000 funds was \$75,000,000 would be used as an Option Fee for the NATIONAL BANK OF GEORGIA, \$25,000,000 would be used to pay off the [REDACTED] loan, and \$45,000,000 would be used for working capital by FAB Bankshares. [REDACTED] stated that it was his understanding that, at that time, the price of the option was concrete and he does not know why they didn't send the capital to FAB when they received the \$150,000,000. [REDACTED] stated that it was his understanding that they were concerned with obtaining enough money to do all of the transactions which were needed and they would go back in 1987 for additional funds for the rest of the purchase.

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[REDACTED] stated he was aware that [REDACTED] and CLIFFORD borrowed money from BCCI to purchase their stock in CCAH and he learned this in mid to late June, 1986. [REDACTED] stated he knew they were buying the shares of stock in June of 1986 and that he first learned about it from either [REDACTED] or [REDACTED] stated that he learned that [REDACTED] was going to release some of their shares on the Rights Offering and that CLIFFORD and [REDACTED] were going to purchase those available shares. [REDACTED] stated he first heard that they were considering buying shares from the [REDACTED] waived shares and that [REDACTED] wanted them to purchase the shares and that he heard this from [REDACTED] around July of 1986. [REDACTED] stated that he had learned from [REDACTED] that they had first attempted to obtain financing for those shares from BAI and that his first understanding was that CLIFFORD was going to purchase approximately 2% of the shares available and [REDACTED] was to purchase approximately 1%.

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[REDACTED] stated it was his first understanding that [REDACTED] and CLIFFORD were going to purchase their shares using their own funds or that they might borrow funds to make the purchase. [REDACTED] stated he had a sense that CLIFFORD could purchase the stock with his own funds, but he does not know if [REDACTED] had enough personal funds to pay for the shares. [REDACTED] stated he learned this information from [REDACTED] stated that he got the sense from [REDACTED] that the transaction involved a

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Continuation of FD-302 of [REDACTED], On 5/22/92, Page 5

lot of money and that [REDACTED] felt that they had to purchase the shares since they had been invited to invest in CCAH and they were afraid to look bad to the shareholders if they didn't take up their invitation. [REDACTED] stated that he was present at a partnership meeting at C and W when CLIFFORD mentioned that he and [REDACTED] were considering purchasing stock in CCAH and that they were considering purchasing shares inasmuch as if they did not purchase shares, they thought it might be misconstrued that they were not confident in CCAH investment. [REDACTED] stated that they were not talking about what this had to do with the law firm but they were just letting the partners know that they were investing and that there was no indications of any affect on C and W. [REDACTED] stated he did not mention a dollar figure but that they were considering purchasing the shares either with their own funds or borrowing. [REDACTED] stated they did not provide any details of their borrowing pertaining to those shares. [REDACTED] stated that it was his indication from CLIFFORD that they needed to carefully consider whether to purchase the shares or due to the confidence factor and it was [REDACTED] feeling that CLIFFORD and [REDACTED] felt they needed to invest in CCAH but they did not really want to purchase the shares inasmuch as it involved a lot of money. [REDACTED] stated that CLIFFORD mentioned the tax implications in regards to his using his own funds by liquidating other investments which he had and that he does not recall [REDACTED] speaking at this partnership meeting.

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[REDACTED] stated that it was a firm policy that any partner that served on a board and received director's fees that those fees would go to the firm. [REDACTED] stated that it was his understanding that all fees paid to CLIFFORD and [REDACTED] relating to their positions with CCAH, went to the C and W law firm. [REDACTED] stated that neither CLIFFORD nor [REDACTED] kept any time sheets relating to their work done for clients. [REDACTED] stated that it's his opinion that the C and W law firm was happy to have FIRST AMERICAN BANK as a client. [REDACTED] stated that there were no discussions with the partners that if the stock purchases by CLIFFORD and [REDACTED] were lucrative that the firm should profit from their investments. [REDACTED] stated that any amount of director's fees paid to CLIFFORD and [REDACTED] were never mentioned by the firm. [REDACTED] stated that [REDACTED] became a partner in the law firm of C and W in [REDACTED] and that in his opinion the director's fees paid to CLIFFORD and [REDACTED] were a non issue inasmuch as the firm was obtaining large fees from their work for FIRST AMERICAN BANK. [REDACTED] stated that the only grumbling going

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Continuation of FD-302 of [REDACTED], On 5/22/92, Page 6

on at C and W relating to any work done with FIRST AMERICAN BANK was that they were not billing FIRST AMERICAN BANK on a monthly basis and that FIRST AMERICAN BANK was slow paying their bills. [REDACTED] stated that he does not recall ever hearing that CLIFFORD and [REDACTED] were deliberately taking low director's fees in regards to their positions with CCAH or FIRST AMERICAN BANKSHARES.

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[REDACTED] stated that part of CLIFFORD's explanation about investing in CCAH was that now that the bank was successful, it was time for them to become investors. [REDACTED] stated he does not recall getting the feeling that this was a plan from the beginning. [REDACTED] stated that they did not keep minutes of the partnership meetings but that he would have on his calendar when these meetings occurred.

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[REDACTED] stated that he was aware that in 1988, CLIFFORD and [REDACTED] sold their shares to [REDACTED], but he does not recall when he found out the amount of money which they had made on their investment. [REDACTED] stated that he is not familiar with the details of the CLIFFORD and [REDACTED] loans from BCCI to purchase the shares, but that he knows that they sold their shares for approximately \$6,800 per share and he also knows how much they paid for their shares. [REDACTED] stated that he had a sense that they had made money on the sale of their stock and he also knew that they had not sold all of their shares in 1988. [REDACTED] stated he knew that they were selling their shares at a good profit, but also knew that they had loans outstanding and that he understood that a motivating factor for them selling their stock was to pay off their loans and that they were taking advantage of a good market. [REDACTED] stated that he heard this information from [REDACTED] stated that he is not aware of anyone else being aware of when they sold their shares nor the amount of money which they made at that time. [REDACTED] stated that it's his understanding that the law firm learned about the details of their selling of their stock from the investigation which was probably first noted in the article in the WASHINGTON POST.

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[REDACTED] stated that there was discussions at the law firm pertaining to the article in the POST and that both CLIFFORD and [REDACTED] were concerned that the article made this look like a "sweetheart deal". [REDACTED] stated that some of the younger partners were surprised by the number of shares and they had discussions of if the funds should have been shared with the

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Continuation of FD-302 of [REDACTED], On 5/22/92, Page 7

firm. [REDACTED] stated there were discussions about the terms, which were used in a press release by FAB, which were written by a team of lawyers, that if in fact it was compensation, then it should have gone to the firm much like director's fees did.

[REDACTED] stated there were also concerns over the future of the firm, but he does not recall there being a partnership meeting on the above issues and he does not recall anyone asking for a meeting to be held. [REDACTED] stated that there were informal discussions between other partners going on, but no meeting between all partners, except CLIFFORD and [REDACTED] to discuss a plan of action.

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[REDACTED] stated that there was a partnership meeting without CLIFFORD and [REDACTED] regarding the [REDACTED] billing practice and the results of that meeting were taken to CLIFFORD and [REDACTED] requesting that [REDACTED] be asked to resign. [REDACTED] stated the original meeting was held without CLIFFORD and [REDACTED] inasmuch as they were not focused on the issue concerning [REDACTED] with all the other things that were going on at that time.

[REDACTED] stated that the partners never made a demand on CLIFFORD or [REDACTED] over the profit that they made on their shares and that it is [REDACTED] personal feeling that they did not need to share their profit with the firm inasmuch as he considered this a personal investment of CLIFFORD and [REDACTED] stated that he does feel director's fees should go to the firm and that his view on the above has not changed over time.

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[REDACTED] stated that one of the most vocal partners about this issue was [REDACTED] and possibly [REDACTED] was also vocal pertaining to this issue. [REDACTED] stated that it is possible that the other partners may have talked to CLIFFORD or [REDACTED] but that there was no group meeting where CLIFFORD and [REDACTED] explained what had happened.

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[REDACTED] stated that he was present in January of 1991 at a meeting at the FED after the details of their transactions had come out. [REDACTED] stated that in late December, 1990, [REDACTED] called and asked for all stock transfers in CCAH history. [REDACTED] stated that there was then a meeting held at the FED with [REDACTED] and [REDACTED] and possibly [REDACTED] stated that [REDACTED] told him that they were starting an investigation and that CLIFFORD and [REDACTED] borrowings did come up in that meeting. [REDACTED] stated that [REDACTED] advised [REDACTED] that they were not aware that the FED was interested in the

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Continuation of FD-302 of [REDACTED], On 5/22/92, Page 8

CLIFFORD and [REDACTED] loans in response to their December, 1990 call previously talked about. [REDACTED] stated that [REDACTED] never did ask why he was not told about the loans and that there was a later meeting with the FED in which just [REDACTED] and [REDACTED] participated. [REDACTED] stated that during the second meeting with the FED, subpoenas were issued for the records of the firm and that from that meeting, [REDACTED] called [REDACTED] and told him that a FED was coming by to pick up records relating to the stock of CCAH. [REDACTED] stated he does not know if [REDACTED] knew about the CLIFFORD and [REDACTED] borrowings from BCCI prior to the meeting. [REDACTED] stated that he told [REDACTED] in a phone conversation, about the subpoena being issued for the CLIFFORD and [REDACTED] records and that [REDACTED] reaction was not violent on [REDACTED] part and he does not recall having a feeling of a need to explain to [REDACTED] as to why they had been subpoenaed.

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[REDACTED] stated that some of the partners came to him asking if he knew about the stock sale and the details of the transaction and he told them that yes, that he had made money but did not know the terms of the loans. [REDACTED] stated he doesn't recall anyone being angry with him for not telling them about the stock transactions at the time that they occurred.

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[REDACTED] stated that after the subpoena, CLIFFORD put together a file, [REDACTED] got together his files, and [REDACTED] pulled their information and it all went to [REDACTED] to view for response for the subpoena, but he does not know if [REDACTED] got a copy of those files. [REDACTED] stated he was not aware of any information being given to [REDACTED] and then taken back. [REDACTED] stated he recalls feeling that his phone call with [REDACTED] was the first time that he was aware of the loans but he doesn't recall if the phone call was before or after the first meeting with the FED. [REDACTED] stated that he felt that [REDACTED] was concerned about how this would be viewed. [REDACTED] stated he does recall a meeting at [REDACTED] and [REDACTED] where [REDACTED] and [REDACTED] were also present. [REDACTED] recalls that in that meeting, they were receiving information that CLIFFORD and [REDACTED] and other shareholders had borrowings from BCCI, which were secured by CCAH shares, but he does not recall the specifics of those meetings. [REDACTED] stated he does recall a meeting in March of 1991 which included CLIFFORD, [REDACTED] and individuals from [REDACTED]

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Continuation of FD-302 of [REDACTED], On 5/22/92, Page 9

[REDACTED] stated that he believes the December 13, 1989 letter to [REDACTED] from [REDACTED] was the first letter regarding the [REDACTED] inquiry. [REDACTED] stated that the above letter came as a surprise inasmuch as he thought the investors had used personal funds in regards to their purchase of the Financial General shares. [REDACTED] stated that either [REDACTED] or his secretary, gave him a copy of the letter and that he talked to [REDACTED] and that this letter should be sent to [REDACTED] and that [REDACTED] told him he was going to contact [REDACTED] to find out about the letter and contact [REDACTED] to find out what this letter was all about. [REDACTED] stated that [REDACTED] reaction was that he wanted to find out what the thrust of the letter was and he didn't detect any real concern with trying to determine what the thrust was so they could prepare an appropriate response. [REDACTED] stated that the request clearly would involve the CLIFFORD and [REDACTED] stock and that [REDACTED] concern at that time was the relationship between BCCI and the CCAH investors. [REDACTED] stated that he had no discussions with [REDACTED] about avoiding telling the FED about the CLIFFORD and [REDACTED] borrowings and that he might have talked to [REDACTED] about the letter and the [REDACTED] and CLIFFORD loans. [REDACTED] stated it was not strange for [REDACTED] to contact the FED direct during any of the time period discussed. [REDACTED] stated that this letter was sent to [REDACTED] to keep him advised and to talk about what steps should be taken next as far as a response was concerned. [REDACTED] stated that [REDACTED] told him he had talked to the FED and they were concerned about loans to shareholders at the time of the acquisition of Finance General. [REDACTED] stated that it evolved that [REDACTED] was going to head the response to [REDACTED] [REDACTED] stated that it was discussed about what the thrust was and the information concerning the Financial General takeover based upon information from overseas which revealed borrowings by CCAH shareholders. [REDACTED] stated he obtained this information from [REDACTED]

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[REDACTED] stated that there were never discussions regarding narrowing the inquiry so as not to disclose CLIFFORD and [REDACTED] loans but only to find out the thrust of the inquiry so that they could prepare appropriate responses. [REDACTED] stated that in 1986 or 1987, he was aware of the credit facility from BCCI to the CCAH shareholders to pay fees associated with the original takeover of the Financial General. [REDACTED] stated the credit facility was guaranteed by [REDACTED] but that it was his understanding that this was not a loan to purchase shares, but simply to pay fees and costs in relation to that transaction.

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Continuation of FD-302 of [REDACTED], On 5/22/92, Page 10

[REDACTED] stated that his definition of a credit facility is an amount available that may or may not be drawn down and once it is drawn down, it is a loan. [REDACTED] stated he learned in 1986 or 1987 from [REDACTED] that the credit facility had been drawn down. [REDACTED] stated in 1986 or 1987, he did not focus on the fact that BCCI was not to loan any money in regards to the original acquisition of Financial General.

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[REDACTED] stated that pursuant to the [REDACTED] letter, they should have disclosed the loan to the CCAH shareholders, but he did not discuss this with [REDACTED] but he did send a draft of the response to [REDACTED], but he did not talk to [REDACTED] about it. [REDACTED] stated that loans related to the acquisition or outstanding loans were to be reported, but [REDACTED] guaranteed loans had been paid off. [REDACTED] stated he recalls that funds were wire transferred to BCCI to pay off and he thinks it was CCAH funds which were used. [REDACTED] stated that then this obligation was to all of the shareholders and not just [REDACTED]

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[REDACTED] advised that he first learned that [REDACTED] was going to be a shareholder during the Share Rights issue. [REDACTED] stated that he understood that [REDACTED] was looking at a variety of percentage ownerships and that there were memos prepared to that effect. [REDACTED] advised that [REDACTED] was being advised by lawyers with [REDACTED] in London over the Regulatory issues. [REDACTED] stated that [REDACTED] was aware of what was contemplated by the shareholders, but that [REDACTED] was not acting as an attorney for anyone in connection with this, but was merely acting as a representative of CCAH. [REDACTED] stated that BCCI's role in this transaction was that through [REDACTED] and they were receiving information on [REDACTED] purchasing and [REDACTED] selling of the shares. [REDACTED] stated that [REDACTED] name did come up in regards to the [REDACTED] holding companies, but that that was later in the transactions. [REDACTED] stated that he did not know the role of [REDACTED] in regards to the [REDACTED] transaction. [REDACTED] stated that he did see a memo from [REDACTED] to [REDACTED], but that he did not know why [REDACTED] was preparing a memo to [REDACTED]. [REDACTED] stated that he was unaware of anyone else at BCCI having a role in the above transaction other than [REDACTED]. [REDACTED] stated that he felt that BCCI's role was that as facilitating and helping with the communications between [REDACTED] and [REDACTED]. [REDACTED] stated he does not know why BCCI was obtaining legal advice from CCAH [REDACTED] about Regulation issues regarding [REDACTED] and it was his understanding that [REDACTED] was

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Continuation of FD-302 of [REDACTED], On 5/22/92, Page 11

[REDACTED] sharing information with [REDACTED] stated he did not know that [REDACTED] bank was going to loan money to [REDACTED] and [REDACTED], but that he found this out from the ETRUSCO people. [REDACTED] stated that ETRUSCO were managing directors for CCAH and that [REDACTED] was the individual dealing with ETRUSCO.

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[REDACTED] stated that he recalls asking [REDACTED] in the fall of 1986 about the price per share that [REDACTED] was paying for the CCAH shares and as he recalls it was \$6,094 per share or approximately 2.7 times book. [REDACTED] stated it was his understanding that those shares were then sold to [REDACTED] at book value. [REDACTED] stated he knew that CLIFFORD and [REDACTED] paid book value for their stock and he did tell [REDACTED] the amount at which the stock was being transferred between [REDACTED] and [REDACTED] and that he recalls [REDACTED] stating that it looked like [REDACTED] had really "flipped" his stock. [REDACTED] stated that as he recalls, [REDACTED] was a little surprised at the quantity of stock which was being transacted. [REDACTED] stated he did not know [REDACTED] was buying BCCI stock at the same time that he was purchasing and selling CCAH stock.

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[REDACTED] stated that he did not know what [REDACTED] documents talked about nor did he know that [REDACTED] had asked to go on the board of BCCI.

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[REDACTED] stated that he learned in August of 1987 that there were loans from NCB to [REDACTED] and that he learned this from ETRUSCO asking that they record the pledge of the stock in the stock registers of CCAH. [REDACTED] stated he knew that the shares of stock were collateral and he thinks that all of the shares that [REDACTED] and [REDACTED] had were pledged. [REDACTED] stated that loan documents were not signed by NCB and that [REDACTED] signature was signed by the directors and [REDACTED] signature was not signed by [REDACTED] stated he thinks the number of shares were on the documents, but he did not figure out that \$6,094 per share was how it worked out.

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[REDACTED] stated that in August of 1987, he talked to [REDACTED] and asked him to check into the documents, which had been dated September, 1986, to see if the documents were in fact correct. [REDACTED] stated that [REDACTED] told him that the loans had not gone through and that at that time he was relying on [REDACTED] information on all of the transactions and that is why he contacted [REDACTED] instead of contacting the shareholders. [REDACTED]

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Continuation of FD-302 of [REDACTED], On 5/22/92, Page 12

[REDACTED] stated that the law firm of [REDACTED] was a law firm which had asked to record the shares which had been pledged. [REDACTED] stated that he was then back in touch with [REDACTED] at ETRUSCO and that he had heard back from [REDACTED] that he did not need to worry about recording the pledge and to send the documents back. [REDACTED] stated that he informed [REDACTED] that the loans had not gone forward or that NCB was not demanding the pledge be made. [REDACTED] stated he discussed this with [REDACTED] and sent a copy of a telefax from ETRUSCO and he was told to call [REDACTED] and find out what it was about. [REDACTED] stated that he recalls that they were trying to record the Stock Pledge to perfect a pledge and that at the end [REDACTED] requested the documents be sent back. [REDACTED] stated in August or September of 1987, he talked to [REDACTED] at [REDACTED] either about this matter or if [REDACTED] was going to file with the FED if he in fact purchased more than ten percent of the shares. [REDACTED] stated they were looking for background information regarding filing for the above ten percent ownership by [REDACTED] stated that he did talk to [REDACTED] about [REDACTED] purchasing more than ten percent of the shares and the filings which would have to occur.

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[REDACTED] stated that he knows that [REDACTED] met with [REDACTED] and that he thinks this occurred between August and September of 1987. [REDACTED] stated he did not see [REDACTED] come in, but that [REDACTED] had told him a couple of days after the meeting that he had talked about possibly buying more than ten percent of the shares, but that he did not know if he was going to do this and that they had worked on the Regulatory issues. [REDACTED] stated that it was his understanding that [REDACTED] was going to file the necessary documentation relating to the FED Regulations.

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[REDACTED] stated that in spring of 1990, there was a telefax from ETRUSCO, asking why the share certificates were sent to ETRUSCO. [REDACTED] stated that [REDACTED] used the term "technical reasons" as to why the pledge was not recorded. [REDACTED] stated that ETRUSCO said that they did have the shares in the file at ETRUSCO and confirmed that the loan did not go through. [REDACTED] stated that on July 10, 1990, he sent a draft letter to [REDACTED] which states that NCB "did not want to record pledge" which means to [REDACTED] that the loans did not go through.

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[REDACTED] stated that he was aware of loans to [REDACTED] and [REDACTED] by NCB inasmuch as he had received a telex from ETRUSCO

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Continuation of FD-302 of \_\_\_\_\_, On 5/22/92, Page 13

dated September, 1986 and August of 1987. \_\_\_\_\_ stated that he was not aware that \_\_\_\_\_ wanted 30% of the shares and that his information from \_\_\_\_\_ was that there was a different percentage of shares involved. \_\_\_\_\_ stated he recalls \_\_\_\_\_ saying that he had a meeting with \_\_\_\_\_ discussing Regulatory issues regarding \_\_\_\_\_ shares over a certain percentage. \_\_\_\_\_ stated he does not know what else was discussed in that meeting or when \_\_\_\_\_ was thinking about buying additional shares in the future. \_\_\_\_\_ stated he did not have any discussions directly with \_\_\_\_\_.

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\_\_\_\_\_ stated that he had received a letter from \_\_\_\_\_ representing NCB's interest asking where the shares were, and that he had faxed this information to \_\_\_\_\_ on July 10, 1990. \_\_\_\_\_ stated that \_\_\_\_\_ did sign on behalf of \_\_\_\_\_ five companies which were given names by \_\_\_\_\_ and it was \_\_\_\_\_ understanding that the holding companies were for the five \_\_\_\_\_ and that \_\_\_\_\_ was looking over the stock. \_\_\_\_\_ stated he showed \_\_\_\_\_ a letter from ETRUSCO saying they had heard from \_\_\_\_\_ and that \_\_\_\_\_ was looking for the stock certificates. \_\_\_\_\_ stated he does not know what technical reasons were for not recording the pledge. \_\_\_\_\_ stated that \_\_\_\_\_ told him to call \_\_\_\_\_ and see what he knew about it and that ETRUSCO did have the certificates there. \_\_\_\_\_ stated he did not know that NCB loans had been made and that he had been told by \_\_\_\_\_ that the loans had not been made. \_\_\_\_\_ stated that it was his feeling that the loans had not been made and NCB would not want to record a pledge on stock that they did not extend funds on. \_\_\_\_\_ stated that he drafted a letter because they had asked him to draft a letter and to send it to them for their review. \_\_\_\_\_ stated that he faxed the letter from ETRUSCO to \_\_\_\_\_ and called \_\_\_\_\_ to confirm that the information concerning the fact that the loans had not gone through was accurate. \_\_\_\_\_ stated that he first learned that the loans had not gone through in 1987 and he reconfirmed this in 1990.

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\_\_\_\_\_ stated that he recalls getting phone calls from \_\_\_\_\_ and discussing either the loans or if the application had been filed by \_\_\_\_\_. \_\_\_\_\_ stated that he also talked to \_\_\_\_\_ (ph) and \_\_\_\_\_ stated that \_\_\_\_\_ was an attorney with \_\_\_\_\_ law office in Dallas, Texas and that he had called to ask \_\_\_\_\_ to gather information for their clients. \_\_\_\_\_ stated that he has never met either of them. \_\_\_\_\_ stated that he advised \_\_\_\_\_ that the loans had

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Continuation of FD-302 of [REDACTED], On 5/22/92, Page 14

not gone through so that the shares were back with ETRUSCO. [REDACTED] stated that he only directed the ETRUSCO officer to not record the pledge by NCB because no loans had been extended.

[REDACTED] stated that he may have talked with [REDACTED] or [REDACTED] about recording the pledge if over 20% of the stock was pledged which would raise a Regulatory issue and this would have been in the fall of 1987.

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[REDACTED] stated that he got the loan documents August 3, 1987 signed by borrowers but the bank had not executed the documents.

[REDACTED] stated that he thinks he sent a draft letter to [REDACTED] and [REDACTED] and he did this as Legal Counsel to CCAH. [REDACTED] stated he possibly sent the drafts through [REDACTED] and that he sent this information to them to tell them that the stock was being held at ETRUSCO. [REDACTED] stated he did get letters back from [REDACTED] and [REDACTED] which were directed to CCAH and that they did come through [REDACTED]

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[REDACTED] stated that in 1987, he spoke with ETRUSCO, possibly three times, concerning the Pledge of Stock and that he told them not to record the pledges. [REDACTED] stated that [REDACTED] did know what [REDACTED] was telling ETRUSCO. [REDACTED] stated that he would have also advised [REDACTED] about what he had learned from the law firm of MILBANK TWEED and that [REDACTED] knew that [REDACTED] was going to tell ETRUSCO not to record the pledge. [REDACTED] stated that he also might have mentioned the FED Regulation issues in his discussion with ETRUSCO over the pledge but he does not specifically recall talking about that issue.

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[REDACTED] stated that his answers from the MILBANK TWEED law firm concerning the FED issues were that it depended upon the facts and circumstances over the entire transactions (the loans). [REDACTED] stated that ETRUSCO was a managing director of CCAH and they were involved in CCAH in the very beginning and formed as a requirement by Antilles Law.

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[REDACTED] stated that in regards to the Riveredge project with NBG, the issues on price came from [REDACTED] stated that he recalls that [REDACTED] had a loan to NBGFC and that he forgave this loan in regards to the Riveredge project. [REDACTED]

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Continuation of FD-302 of [REDACTED], On 5/22/92, Page 15

[REDACTED] stated that he never did talk with [REDACTED] but that he would have either of talked with [REDACTED] or [REDACTED].

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[REDACTED] stated that any price increase information would have come from [REDACTED] [REDACTED] stated he does not specifically recall the details of the Parkway Note, but it had something to do with the funding of the initial building. [REDACTED] stated he recalls the Master Lease was losing money and that that was an issue. [REDACTED] stated that he does not recall when he became aware of the Master Lease issue.

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[REDACTED] was shown a June 1, 1987 memo regarding Riveredge which he reviewed and stated that he thinks that he first became aware of the Master Lease when [REDACTED] came to NBG in April or May of 1987 to do a due diligence report. [REDACTED] stated that he thinks he received a copy of the Master Lease from [REDACTED] of NBG. [REDACTED] stated that he does recall that there was a tax issue relating to Riveredge, but he does not recall any specifics.

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[REDACTED] stated that [REDACTED] was an attorney with C and W, but that he left C and W and went to the FDIC as a speech writer, but he does not know where [REDACTED] is currently. [REDACTED] stated that [REDACTED] was a summer associate with C and W and he does not know where [REDACTED] is currently.

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[REDACTED] stated that after he received the Master Lease, he gave it to [REDACTED] and told [REDACTED] to look at it in regards to the legal issues which would arise. [REDACTED] stated that he saw the Master Lease as a management problem and he recalls going to [REDACTED] after the due diligence, asking if they were still going forward with the transaction which he advised that he was.

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[REDACTED] stated that [REDACTED] was not happy with having to take over the Master Lease, but that they would take care of it. [REDACTED] stated that although they would have preferred not to have the Master Lease, they felt that they could handle the Master Lease after the acquisition of NBG. [REDACTED] stated that he clearly spoke to [REDACTED] about the Master Lease, but he does not recall specifically what they talked about or what was said. [REDACTED] stated he thinks it was in the context of if the due diligence turned up anything whether or not to let the deal go through. [REDACTED] stated he does not recall ever discussing reducing the price of NBG in regards to the acquisition.

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Continuation of FD-302 of \_\_\_\_\_, On 5/22/92, Page 16

\_\_\_\_\_ was shown a June 29, 1987 memo, prepared by \_\_\_\_\_, which he stated he thought was sent to \_\_\_\_\_ because they had been asked to look at the issues.

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\_\_\_\_\_ was shown a July 8, 1987 draft, which he stated contains his handwriting, but he does not know if it was executed. \_\_\_\_\_ stated that he thinks this had to do with the Tax Liability issue only. \_\_\_\_\_ stated that \_\_\_\_\_ prepare a Proforma Financial Statements to the FED regarding FIRST AMERICAN BANK in the summer of 1987 and he does not know if those were changed after that.

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\_\_\_\_\_ stated that he had the sense that ALTMAN was skeptical of \_\_\_\_\_ and that when the Master Lease came up, he was not surprised. \_\_\_\_\_ stated that \_\_\_\_\_ was not happy about having the Master Lease as part of the transaction and that it was not a big enough of a deal to call off the entire acquisition. \_\_\_\_\_ stated that he thinks that the 1987 Share Rights Offering amount was influenced by the Master Lease. \_\_\_\_\_ stated he does not know if \_\_\_\_\_ talked to or complained to \_\_\_\_\_ or \_\_\_\_\_ about the Master Lease.

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\_\_\_\_\_ stated that in his opinion, the Master Lease was a significant issue which was raised by the due diligence report.

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\_\_\_\_\_ stated that he learned of \_\_\_\_\_ and CLIFFORD's loan request with BAI in June of 1986. \_\_\_\_\_ stated that he was told that CLIFFORD and \_\_\_\_\_ were thinking about purchasing stock in CCAH and that \_\_\_\_\_ was talking to \_\_\_\_\_ at \_\_\_\_\_ and they were having conversations with \_\_\_\_\_ at BAI about borrowing money to purchase the stock. \_\_\_\_\_ stated he does recall that BAI was not interested in loaning \_\_\_\_\_ and CLIFFORD money on a non recourse status. \_\_\_\_\_ stated that he never heard about any guarantee to buy back the stock and that \_\_\_\_\_ was just telling him about the problems that they were having with BAI not cooperating with the terms of the loan, which he took to mean the non recourse issue. \_\_\_\_\_ stated that prior to the Rights Offering, \_\_\_\_\_ had told him that BAI talks had broken down and that they would be borrowing their money from BCCI. \_\_\_\_\_ stated that he was told this so that he would know when he was preparing for the Rights Offering that \_\_\_\_\_ and CLIFFORD would be buying stock. \_\_\_\_\_ stated that he believes \_\_\_\_\_ knew that CLIFFORD and \_\_\_\_\_ were borrowing from BCCI and he believes that he \_\_\_\_\_ knew that

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Continuation of FD-302 of \_\_\_\_\_, On 5/22/92, Page 17

\_\_\_\_\_ knew at that time. \_\_\_\_\_ stated that he learned all of the above information during the time that it was occurring and he believes he learned it about prior to the Rights Offering. b6  
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\_\_\_\_\_ stated that \_\_\_\_\_ response to \_\_\_\_\_ regarding the \_\_\_\_\_ inquiry was drafted at C and W and sent to \_\_\_\_\_. \_\_\_\_\_ stated that he might have done some preliminary drafting and then gave to \_\_\_\_\_ for his modifications and then subsequently it was given back to \_\_\_\_\_ to send to \_\_\_\_\_ and \_\_\_\_\_ stated that \_\_\_\_\_ had told him that \_\_\_\_\_ had asked \_\_\_\_\_ to draft a letter which they did. \_\_\_\_\_ stated that once it went to \_\_\_\_\_, he did not have anything else to do with the redrafting of the letter. \_\_\_\_\_ stated that in the February 15, 1990 memo from \_\_\_\_\_ to \_\_\_\_\_ the term "background" meant that he told \_\_\_\_\_ about the purpose of the letters to the shareholders to give BCCI permission to disclose borrowings. \_\_\_\_\_ stated that he only heard back from \_\_\_\_\_ and \_\_\_\_\_, but that \_\_\_\_\_ confirmed that all shareholders had received the letters. b6  
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- 1 -

## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 7/30/92

On 7/24/92, [REDACTED] JONES, DAY, REAVIS,  
AND POGUE, 1450 G. STREET, N.W. WASHINGTON, D.C. 20005-2088  
provided the following documents to SA [REDACTED]:

1) Copies of transcripts from selected FIRST AMERICAN BANK (FAB)  
management meetings for the years 1987, 1988, and 1990.

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The above documents were provided to SA [REDACTED] pursuant to  
the interview of [REDACTED].

Investigation on 7/24/92 at WASHINGTON D.C. File # 29B-WF-171994-2  
by SA [REDACTED] Date dictated 7/30/92

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Office of the Legal Attache  
American Embassy  
London, England



b7E

Secure Fax No.: [redacted]  
Non-Secure Fax No.: 71 499 7944  
Telephone Number: 071-499-9000, ext 2478

Page 1 of 5 pages

Date: 8/21/92

☐ IMMEDIATE  
☐ PRIORITY  
☒ ROUTINE

☒ SECURE  
☒ NON-SECURE  
CLASSIFICATION: \_\_\_\_\_

TO: FBI, BCCI Squad

FILE NO: 29B-WF-171994

FAX NUMBER: (202) 324-9335

ATTN: SSA's [redacted] / [redacted]

FROM: LEGAL ATTACHE, LONDON

FILE NO: 29B-WF-171994

ORIGINATOR: SA [redacted], WMFO

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SUBJECT: \_\_\_\_\_

COMMENTS/MESSAGE:

[redacted] received this 8/20/92 - Just  
want to make sure you're aware of it esp.  
as it relates to [redacted]. (pg. 3)

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Regards, 29B-WF-171994-3

[redacted]

Sub W

Approved

[redacted]

SEARCHED	INDEXED
SERIALIZED	FILED
AUG 21 1992	
[redacted] OFF [redacted]	

2

# Memorandum

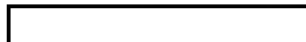


To : SAC, WMFO (29B-WF-171994) (P)

Date 8/31/92



From : SA



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Subject: HIDDEN INTERESTS  
MAJOR CASE #38

Reference memo dated 8/25/92 to all team leaders from Llewellyn.

For information, through prior interviews of BCCI employees it has been learned that the pertinent information re CLIFFORD and [redacted] participation in criminal activity with BCCI was contained in the legal files of BCCI and in certain files which are now located in ABU DAHBI.

Based upon the above information, it was decided that SA [redacted], SA [redacted] and FA [redacted] would travel to London and review the legal files and subsequently interview [redacted]. The above SA's and [redacted] reviewed the legal files and obtained valuable information re the upcoming trial. In addition, [redacted] again advised that only the legal files contained information that would be of value to the trial, due to the fact that the other important documents were previously shipped to ABU DAHBI.

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SA [redacted] has spoken with DOJ attorneys [redacted] and [redacted] who agree that the most pertinent documents re the trial were contained in the legal files, which were reviewed as stated above.

Due to the above information, and the fact that the trial preparation team is currently preparing for the upcoming trial, it is recommended that no one from the trial preparation team be assigned to the London review. It should be noted that TEAM 1 will provide information to the review team which will assist them in identifying information which should be passed on to TEAM 1 during their review.

29B-WF-171994-4

Sub W

2-WMFO (29B-WF-171994)

SEARCHED	SW	SW
SERIALIZED		
OCT 1 1992		
FBI - [redacted]		

It is felt that due to the fact that there is less than eight weeks to the trial, the efforts of the trial preparation team would be best utilized here in the preparation for the trial.



- 1 -

## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/15/92

[redacted] DOB [redacted] was interviewed at the office of JONES, DAY, REAVIS & POGUE, 1450 G Street, N.W., Washington, D.C. 20005-2088, telephone [redacted]. Also present during the interview was [redacted]

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[redacted] First American Bankshares, Inc. (FABS), Attorney [redacted] and [redacted] DOJ Trial Attorneys [redacted]

After being advised of the official identity of the interviewing agent and of the nature of the interview, [redacted] provided the following information:

[redacted] advised that his Social Security Account Number is [redacted] and his home address is [redacted]

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[redacted] advised that he began employment with FABS on [redacted] and that prior to his employment with FABS, he was employed by ARTHUR ANDERSEN, PERPETUAL GUARANTEE, and FIRST CITY BANK in Texas.

[redacted] advised that in his capacity as [redacted] he came to have an audit prepared in 1990 relating to the Bank of Credit and Commerce International (BCCI). [redacted] advised that he received a memo from CLARK CLIFFORD dated 4/26/90 relating to this audit and that he also had discussions with [redacted] who is employed at the law firm of CLIFFORD & WARNKE (C&W). [redacted] stated that [redacted] had telephoned him about the memo and that they were requesting an audit be performed to look into any money laundering activities and also any transactions involving [redacted]. [redacted] stated that he then initiated an audit by FABS which resulted in a report dated 12/4/90, which [redacted] advised was his report and was sent to [redacted]. [redacted] stated that he gave [redacted] six copies of that report and that he believes that one of those copies was to go to [redacted]. [redacted] stated that he wrote the report in August or September 1990 and gave this report to [redacted] for his input.

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Investigation on 8/27/92 at Washington, D.C. File # 29B-WF-171994 -7

by SA [redacted] Date dictated 9/1/92

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Continuation of FD-302 of [REDACTED], On 8/27/92, Page 2

[REDACTED] advised that throughout the audit process he reported to [REDACTED] and provided such information as the approach to be used for the audit and when the audit was initiated. [REDACTED] stated the audit was performed through the months from May 1990 through September 1990. [REDACTED] advised that they received a list of BCCI affiliates, BCCI employees in New York and Washington, D.C., and FAB personnel who had BCCI clients and checked these various names against the records of FAB, again in search of any possible money laundering activity. [REDACTED] stated they compared the above names with the customer information files to uncover any flow of funds which would be unusual and representative of money laundering activity. [REDACTED] advised that the employee accounts were looked at for both the use and flow of funds.

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[REDACTED] stated that next they reviewed wire transfer records and that they reviewed all wire transactions for all FAB metro banks for a prior five years and that they were looking for the BCCI name on any incoming wire transfers. [REDACTED] stated they also looked at mortgage loans.

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[REDACTED] stated that the results of their audits revealed the Knoxville bank had no real BCCI activity, the Miami bank had an import/export company using BCCI as their bank, the Pensicola bank had no activity, and the Georgia bank had an account with BCCI but not much activity. [REDACTED] advised that as far as the FAB metro banks were concerned, the only account that they had was a BCCI Washington agency account and that they identified all wire transfers from BCCI to FAB and they traced these funds to legitimate business transactions.

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[REDACTED] advised that he believes the Regardies magazine article prompted the audit and it was clear to him that the audit was looking for money laundering activity and any transactions relating to [REDACTED]

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[REDACTED] advised that it was [REDACTED] who instructed him to put "privilege an attorney work product" on the audit report and that [REDACTED] also told him that it was possible that the Tampa indictment would bring possible litigation against FAB. [REDACTED] advised that he did talk to [REDACTED] about the fact that the report might be shown to the Federal Reserve Board (FED), and there was a FED exam during the audit. [REDACTED] stated there was a female from Richmond Division performing the audit and that she had asked him about the audit and requested a copy of the audit when

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Continuation of FD-302 of \_\_\_\_\_, On 8/27/92, Page 3

it was completed. \_\_\_\_\_ advised that he did give a copy of the audit to the female from Richmond and that there was a subsequent FED audit after his audit was complete.

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\_\_\_\_\_ advised the paragraph in this report relating to the FAB account officer was noted also to CLIFFORD & \_\_\_\_\_. \_\_\_\_\_ advised that he knew that CLIFFORD & \_\_\_\_\_ were attorneys for BCCI regarding the Tampa indictment and that he found this out early in the audit.

\_\_\_\_\_ advised that shortly after the CLIFFORD memo requesting the audit, he received a call from \_\_\_\_\_ and a meeting was set up at the Washington bank. \_\_\_\_\_ advised that on May 9, 1990, he was introduced to \_\_\_\_\_ and \_\_\_\_\_. \_\_\_\_\_ advised that \_\_\_\_\_ is an attorney working on the BCCI compliance issues and \_\_\_\_\_ had stated that he wanted him to know these people inasmuch as they could assist him on the audit. \_\_\_\_\_ stated that he saw this situation as all of them sort of working towards the same goal and he had a meeting with \_\_\_\_\_ and \_\_\_\_\_ advised that he also sent them questions through \_\_\_\_\_ and that he also had fact-to-face meetings with them concerning questions that he had which they could find the answers to. \_\_\_\_\_ stated that he never did receive any of the information from \_\_\_\_\_ or \_\_\_\_\_ which he had requested.

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\_\_\_\_\_ stated that it was his understanding that \_\_\_\_\_ was in London and Geneva quite a bit meeting with BCCI management and that he was coming back to the U.S. and meeting with \_\_\_\_\_ and \_\_\_\_\_ and therefore could obtain some answers to questions relating to the audit for him. \_\_\_\_\_ advised that some of the issues which he had requested of \_\_\_\_\_ were the following:

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1. \_\_\_\_\_ requested \_\_\_\_\_ to find out about BCCI employee accounts which had cashier's checks in the amount of less than \$9,000 being deposited to the BCCI account at FAB/New York.
2. \_\_\_\_\_ requested \_\_\_\_\_ to attempted to find out about a large \$80 million transaction which was moved around quite a bit to BCCI accounts at FAB/New York for which FAB/New York did not have explanations to purpose of those funds.

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Continuation of FD-302 of [REDACTED]

, On 8/27/92, Page 4

[REDACTED] advised that FAB/New York had large wire transfers regarding [REDACTED] and ICIC but that he did not know what ICIC was. [REDACTED] advised that he discovered that ICIC was 20 percent owned by BCCI so he asked [REDACTED] about ICIC and was told that it was a legitimate company and it was involved with [REDACTED] and was a big borrower of BCCI funds. [REDACTED] stated he also received a list which was compiled by [REDACTED] but that he requested this list through [REDACTED] by telling him what he needed and that [REDACTED] then received this information from [REDACTED]. [REDACTED] advised that the audit division then added names to that list that they knew and he thinks that the list was compiled from the annual report of BCCI and that the names that the audit division added were [REDACTED] name and that the final list was in the audit papers.

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[REDACTED] advised that he knew the Credit and Commerce American Holdings (CAAH) shareholders were [REDACTED] and others, and he believes he got a list from the Regardies article but he does not recall if he asked [REDACTED] or [REDACTED] for a list of all shareholders of CCAH.

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[REDACTED] stated that he should have been provided CLIFFORD and [REDACTED] names on the list to have completed the audit and he does not think that he got all the information needed at the time of the audit. [REDACTED] stated he also should have been told about the Federal Grand jury in New York which was ongoing during the period of the audit and that he should have known about the allegations about BCCI being the "crooks and criminals" if they were aware of it at that time. [REDACTED] stated he was only told about the Tampa indictment and he was told there were a handful of bad apples out of the whole bunch. [REDACTED] advised that after he saw a subpoena that was issued relating to the money laundering indictment, he realized the probe was much more in-depth than he was led to believe and that he should have been given a full disclosure.

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[REDACTED] advised that the audit went as far back as 1985 and they did not find a list of payments to FAB officers from BCCI.

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[REDACTED] stated that at some point and time he found out that [REDACTED] and [REDACTED] were former BCCI employees and that he was aware that [REDACTED] received a low interest loan. [REDACTED] stated that he was not aware that YOLLES did any part of an audit independent

29B-WF-171994

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Continuation of FD-302 of [redacted], On 8/27/92, Page 5

of his and that [redacted] did send a letter to the CEO's of the independent banks about the relationship with BCCI in the Spring of 1990. [redacted] advised that he did take [redacted] to New York to meet with [redacted] and [redacted] but he does not recall any other meetings. [redacted] stated that he was not aware of any prior request to banks relating to FABS regarding their relationship. [redacted] advised that in January 1990, he received a request from [redacted] regarding the Bank Secrecy Act compliance and that [redacted] had sent letters to the CEO's of the banks about this but it was not surprising to him. [redacted] advised that he does not recall if he told [redacted] about [redacted] low interest mortgage and that [redacted] FAB/New York, told him about it. [redacted] stated he did not interview [redacted] about this.

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[redacted] advised that there was a review of personal checking accounts which were conducted at the same time when they were reviewing the incoming wire transfers and he discovered the CLIFFORD and [redacted] loans from BCCI. [redacted] advised that he could not find all wire transfer tickets and that the records have been moved so many times that they had been misplaced. [redacted] stated that later they found them and that there were not any unusual activity. [redacted] advised that he was not asked to look at CLIFFORD and [redacted] personal accounts but that he decided to do this on his own. [redacted] stated he did not want to tell them that he was looking at their accounts and that he received the canceled checks from the CLIFFORD and [redacted] accounts to BCCI showing interest payments. [redacted] stated that three to four days later he received the incoming wire information and so he felt comfortable going to them about the information. [redacted] advised that it was in the last week of July when he found the existence of the loans from BCCI to CLIFFORD and [redacted] [redacted] advised that they traced the disbursement of the funds and as he recalls there was approximately \$20 million into CLIFFORD's account and \$14 million out of the account to BCCI and approximately \$10 million deposited into [redacted] account with approximately \$7 million going out to BCCI. [redacted] stated he recalls the money was in and out to the BCCI Caymans bank. [redacted] advised that as he recalls, CLIFFORD sent \$7 million to an investment account that he had and that [redacted] \$2 million went to a certificate of deposit at FAB and paid \$350,000 plus interest to CLIFFORD. [redacted] advised that it looked to him like an investment and [redacted] advised the auditors that he would take care of it.

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Continuation of FD-302 of \_\_\_\_\_, On 8/27/92, Page 6

\_\_\_\_\_ stated that he was surprised to find that CLIFFORD and \_\_\_\_\_ had a relationship with BCCI when they were trying to keep at arms length from them and he just wanted to find out what it was about. \_\_\_\_\_ advised that he guessed that it was probably a real estate transaction that they financed offshore and he decided to check the regulation O requirements and therefore talked with \_\_\_\_\_ who was the compliance officer which satisfied him that there were no regulation O disclosures which had not been met.

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\_\_\_\_\_ advised that on a Friday afternoon he met with \_\_\_\_\_ and showed him the documents and stated that he needed to talk to \_\_\_\_\_ advised that he decided that he should talk to \_\_\_\_\_ about the information discovered, and that he should have \_\_\_\_\_ set up a meeting between himself and \_\_\_\_\_ stated that he also decided to talk to \_\_\_\_\_ after he had his talk with \_\_\_\_\_ advised that he did talk to \_\_\_\_\_ who stated that he would contact him back and he decided only to talk to \_\_\_\_\_ because he was the one managing the bank. \_\_\_\_\_ advised that later \_\_\_\_\_ contacted him and stated that he would call him back on Monday and said that he had talked to \_\_\_\_\_ and he wanted more specifics and so \_\_\_\_\_ contacted \_\_\_\_\_ and a meeting was set up later in the day. \_\_\_\_\_ advised that he notified \_\_\_\_\_ of the pending meeting and that \_\_\_\_\_ asked \_\_\_\_\_ to stop by after the \_\_\_\_\_ meeting to discuss with him what had occurred. \_\_\_\_\_ stated that \_\_\_\_\_ was surprised to hear about the transaction.

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\_\_\_\_\_ advised that on August 1, 1990, at approximately 5:00 pm, he met with \_\_\_\_\_ and showed him the documents which they had pulled relating to his and CLIFFORD's BCCI loans. \_\_\_\_\_ advised that \_\_\_\_\_ advised him that some of the 1986 shares of CCAH stock were not taken in the share rights offering and so he and CLIFFORD had been given an opportunity to buy those shares and the purchase was financed by BCCI. \_\_\_\_\_ advised that \_\_\_\_\_ told him that they had originally wanted a loan from BAI and that attorneys for the firm of WACHTEL LIPTON was working on the loan agreement but that the details of the loan could not be worked out and that BCCI was not as "sticky" on their terms. \_\_\_\_\_ advised that \_\_\_\_\_ told him that they had bought the subsequent years required amounts of stock in 1987 and that in 1988, they were interested in selling their stock and that there was a middle eastern investor who was interested in buying the stock, so their shares were sold. \_\_\_\_\_ advised that \_\_\_\_\_ told

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Continuation of FD-302 of \_\_\_\_\_, On 8/27/92, Page 7

him that the proceeds from the sale of that stock was used to pay off the BCCI loans and that he had no further loans from BCCI but that they did still own a small amount of CCAH stock. \_\_\_\_\_ advised that \_\_\_\_\_ was questioned concerning regulation O requirements because it was a stock transaction and that \_\_\_\_\_ had told him that they had been reported on the Y-6 reports. \_\_\_\_\_ advised that he asked \_\_\_\_\_ to prepare a memo to document what they had just discussed and that the audit then continued to look into money laundering activity.

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\_\_\_\_\_ advised that he subsequently met with \_\_\_\_\_ and provided the information as discussed and that the next day he met with \_\_\_\_\_ and advised him of the same. \_\_\_\_\_ advised that \_\_\_\_\_ was shocked by the information provided and that he did get a memo from \_\_\_\_\_ dated August 1, 1990, but he did not actually receive the document until late-November or early-December 1990. \_\_\_\_\_ advised that he did not talk about the terms of the loans from BCCI to \_\_\_\_\_ and \_\_\_\_\_ and he neither asked about the terms nor did \_\_\_\_\_ bring up the terms.

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\_\_\_\_\_ advised that unknown to him, \_\_\_\_\_ had contacted \_\_\_\_\_ and advised \_\_\_\_\_ of the discovery of CLIFFORD and \_\_\_\_\_ loans from BCCI. \_\_\_\_\_ advised that they in fact held a meeting and that he \_\_\_\_\_ was called on a Sunday afternoon at home and questioned further about his discovery. \_\_\_\_\_ stated that it was decided that \_\_\_\_\_ and \_\_\_\_\_ would go to a meeting and discuss this matter with \_\_\_\_\_ and it was decided that \_\_\_\_\_ would go meet with CLIFFORD the next day. \_\_\_\_\_ advised that he later learned that they in fact had met with CLIFFORD the following day. \_\_\_\_\_ stated that it was his opinion that even after the meeting with CLIFFORD that they did not know the terms of the loans with BCCI.

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\_\_\_\_\_ advised that there was an audit committee meeting coming up and they were undecided as to whether they would report the discovery to the committee, but they then agreed that they did not need to report this to the committee inasmuch as \_\_\_\_\_ was the head of that committee. \_\_\_\_\_ stated that, in approximately January 1991, he told \_\_\_\_\_ that he felt they should tell the committee but they had decided to wait for a few days.

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\_\_\_\_\_ advised that it was his decision to not include the CLIFFORD and \_\_\_\_\_ loans from BCCI in the report inasmuch as

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Continuation of FD-302 of \_\_\_\_\_, On 8/27/92, Page 8

it was a personal transaction and not related to money laundering.

\_\_\_\_\_ advised that in mid-October 1990 he contacted \_\_\_\_\_ and advised him that the report was ready but that he still needed the memo from CLIFFORD and \_\_\_\_\_ before he could send the report out. \_\_\_\_\_ advised that he finally did get the memo in late-November or early-December 1990 and that he only waited for the memo to document his file. \_\_\_\_\_ advised that \_\_\_\_\_ brought the memo over to him and at that time he \_\_\_\_\_ realized that the memo was not signed and he mentioned this to \_\_\_\_\_ advised that \_\_\_\_\_ reaction was that this was not a problem inasmuch as there were lots of memos which were prepare by CLIFFORD and \_\_\_\_\_ that they did not sign. \_\_\_\_\_ advised that he did not realize it was dated August 1, 1990 until much later, but that this did not really cause him any concern. \_\_\_\_\_ advised that he only discussed the loans and the meeting with \_\_\_\_\_ with \_\_\_\_\_ and he assumed \_\_\_\_\_ had discussions with \_\_\_\_\_ stated that he did tell \_\_\_\_\_ they were going to review five years worth of wire transfer records on all metro banks. \_\_\_\_\_ advised that \_\_\_\_\_ was the FAB employee who found the \_\_\_\_\_ checks and worked for him during the audit.

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\_\_\_\_\_ advised that he does recall wire transfers in the amount of \$29 million and \$45 million and as he recalls, one was in Washington, D.C. and one was in New York. \_\_\_\_\_ stated they discovered these transfers through the incoming wire transfers and he assumed they were capital issues and he in fact called \_\_\_\_\_ and he was told that they were capital issues and they invested offshore because they did not need the funds at that time. \_\_\_\_\_ stated he does not recall a \$150 million transfer.

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\_\_\_\_\_ advised that he was in attendance at the 1991 senior management meeting which was held when CLIFFORD spoke about BCCI. \_\_\_\_\_ advised that the meeting was called to address all of the publicity surrounding FAB and BCCI and there were approximately 30 people in attendance in the board room at 15th and H Streets in Washington, D.C. \_\_\_\_\_ advised that most of the talking during this 45 minute meeting was by CLIFFORD and that he went over the relationship with BCCI from 1978 through 1991.

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Continuation of FD-302 of [REDACTED], On 8/27/92, Page 9

[REDACTED] stated that this speech by CLIFFORD was basically the same as the speech he made at the congressional hearings. [REDACTED] stated that CLIFFORD did not mention that they were shareholders nor did he mention that they had received loans from BCCI. [REDACTED] stated he does think that CLIFFORD should have told the senior management about this transaction and he was disappointed it was not disclosed and found himself waiting for CLIFFORD to tell the group about it. [REDACTED] stated that he felt that it was important for the management to know and that he felt the word would be out very soon about this and thinks it should have been brought out in this meeting prior to coming out in the press. [REDACTED] stated he does not recall the issue of compensation regarding the stock coming up in this meeting and [REDACTED] advised that he considers it a personal investment.

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[REDACTED] advised that [REDACTED] informed [REDACTED] about the CLIFFORD and [REDACTED] transaction. [REDACTED] stated that he read about the terms of the loans in the newspaper as a later date. [REDACTED] stated that he was also in attendance in May 1991 when [REDACTED] held a meeting at FAB in Virginia and [REDACTED] basically gave CLIFFORD's earlier speech and talked about compensation and how they had not been compensated as directors for CCAH. [REDACTED] stated that he found it strange that BCCI would compensate CLIFFORD and [REDACTED] for work done for CCAH and FAB.

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# Memorandum



To : SAC WMFO (29B-WF-171994) (P)

Date 12/4/92

From

SA

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Subject: HIDDEN INTERESTS  
MAJOR CASE #38

Reference lead # 43.

On 12/3/92, SA [ ] telephonically contacted [ ]  
[ ] DANY, [ ] re [ ]  
advised that he is scheduled to interview [ ] in Arkansas on  
12/16/92 about [ ] role with FGB/NBG.

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SA [ ] discussed the interview with [ ] and is  
satisfied that the DANY interview of [ ] will cover all  
aspects of interest to the BCCI Task Force. [ ] advised that  
he will contact SA [ ] after the interview and provide a  
summary of the interview at that time.

On 12/3/92, SA [ ] and SSA [ ] discussed the  
above and it was agreed that inasmuch as the BCCI Task Force  
currently does not have any active investigation pertaining to  
[ ] we will not participate in the interview of [ ]

In view of the above, Lead #43 should be considered  
covered.

3 WMFO (1-29B-WF-171994)  
(1-SSA [ ])  
(1-IIC [ ])

29B-WF-171994 Sub W

SEARCHED	Su	INDEXED	Su
SERIALIZED	Su	FILED	Su
DEC 7 1992			
FBI — WASH. FIELD OFFICE			

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In Reply, Please Refer to

File No. 29B-WF-171994

## FBI CASE STATUS FORM

Date: 1/13/93To: ROBERT M. MORGENTHAU, District Attorney, County of New York  
(Name and Address of USA)From: ROBERT M. BRYANT  
(Name of Official in Charge and Field Division)

(Signature of Official in Charge)

RE: HIDDEN INTERESTS  
(Name of Subject)

Age

Sex

You are hereby advised of action authorized by

U. S. DOJ TRIAL ATTORNEY

(Name of USA or AUSA)

on information submitted by Special Agent

[Redacted]

(Name)

on

1/13/93

(Date)

(Check One)

- ☒ Request further investigation
- ☐ Immediate declination
- ☐ Filing of complaint
- ☐ Presentation to Federal Grand Jury
- ☐ Filing of information
- ☐ Other

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b7CFor violation of Title 18, USC, Section(s) 371; 1005; 1344Synopsis of case: Referencing 1/5/93 faxed request are:

1. A list of interviews done and dates accomplished;
2. One copy each of the agents notes taken during each of the listed interviews.

1 - WMFO (29B-WF-171994) (P)

1 - COUNTY OF NEW YORK (Enc. 1) <sup>427</sup>

1 - [Redacted] (Enc. 1)

JNR;srd

(3)

29B-WF-171994 Sub W

Searched SU

Serialized SU

Indexed SU

Filed SU

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INTERVIEWEE

INTERVIEW DATES



.....10/22/91, 7/8/92  
.....2/21/92  
.....6/8/92  
.....8/1/91, 8/14/91, 12/6/91,  
.....5/29/91  
.....5/12/92  
.....6/9/92, 6/18/92  
.....7/27/92, 4/28/92  
.....9/5/91, 11/11/91, 12/2/91,  
.....1/16/92, 7/10/92  
.....10/23/91  
.....2/26/92, 6/3/92  
.....5/6/92  
.....10/27/92, 8/8/91, 1/9/92,  
.....7/13/92, 5/11/92, 5/22/92  
.....12/11/91, 8/27/92  
.....11/3/92  
.....3/20/92, 7/10/92  
.....1/29/92  
.....5/29/91  
.....8/14/91, 7/31/91  
.....2/28/92  
.....10/3/91  
.....9/19/91, 8/25/92  
.....10/1/91  
.....1/15/92, 4/28/92, 7/27/92  
.....5/22/92

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# Memorandum



To : SAC, WMFO (29B-WF-171994) (P)

Date 1/14/93

From

SA [redacted]

Subject:

HIDDEN INTERESTS  
MAJOR CASE #38  
FIF; FAG;  
OO:WMFO

RE: Lead #72 concerning [redacted]

SA [redacted] contacted [redacted] on 12/11/92. [redacted] advised that [redacted] is willing to speak to investigators as long as an acceptable "package" can be agreed upon including but not limited to protection, recovery of "expenses" and "assets" as well as other financial considerations. [redacted] advised that DANY and DOJ (URGENSON) are aware of [redacted] request. SA [redacted] promptly advised DOJ Attorney [redacted] of this conversation.

On 1/11/93, [redacted] advised SA [redacted] to, until further notice, suspend attempts to contact [redacted]

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2 - WMFO

(1 - 29B-WF-171994)

(1 - SSA [redacted])

29B-WF-171994 Sub-W-10

SEARCHED	INDEXED
SERIALIZED <i>SW</i>	FILED <i>SW</i>
JAN 14 1993	
FBI - WMFO FIELD OFFICE	



DISTRICT ATTORNEY  
OF THE  
COUNTY OF NEW YORK  
ONE HOGAN PLACE  
NEW YORK, N.Y. 10013  
(212) 335-9000

ROBERT M. MORGENTHAU  
DISTRICT ATTORNEY

January 19, 1993

[Redacted]  
Special Agent  
Federal Bureau of Investigations  
7799 Leesburg Pike  
Falls Church, VA 22043

Re: People v. Clark M. Clifford  
People v. [Redacted]  
N.Y. Co. Ind. No. 6994/92

Dear [Redacted]:

I sent your agency a letter dated November 13, 1992 requesting that they search their files and provide us with a copy of anything that constitutes a "statement" of any of the individuals named in the list enclosed with our letter. The enclosed list contains updated personal information for our witnesses. The highlighted names are additional witnesses which were not included on the previous list. Once again, we ask that you continue searching your files and provide us with a copy of anything that constitutes a "statement," as defined in our letter dated November 13, 1992, for the individuals included in the enclosed list. If upon completion of your search, you have not found any such "statements," we ask that you indicate this to us in writing.

We realize that this request will exact some burdens upon your organization. We appreciate the efforts that you make to provide this Office with possession of the indicated statements, and thank you in advance for your anticipated courtesy and promptness in carrying out our request. If you have any questions, please call me at (212) 335-9622. In any event, we would be grateful for a written response to our request from your agency.

Sincerely,

[Redacted]  
Assistant District Attorney

2AB-WF-171994 Sub W - 11  
SEARCHED SW INDEXED SW  
SERIALIZED SW FILED SW

JAN 23 1993

FBI - WASH. FIELD OFFICE



Recycled Paper

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Witness Name

Date & Place  
of Birth

SS# or FP#

- 1.
- 2.
- 3.
- 4.
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- 12.
- 13.

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Witness Name

Date & Place  
of Birth

SS# or FP#

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Witness Name

Date & Place  
of Birth

SS# or FP#

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37.

38.

b6  
b7C

Witness Name

Date & Place  
of Birth

SS# or FP#

39.

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b6  
b7C

Witness Name

Date & Place  
of Birth

SS# or FP#

52.

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b6  
b7C

Witness Name

Date & Place  
of Birth

SS# or FP#

68.

--

b6  
b7C

\* Highlighted Names Are Additional Witnesses Not Included On The  
Previous List

*Embassy of the United States of America***OFFICE OF THE LEGAL ATTACHE  
BRUSSELS, BELGIUM****TELEFAX NO. (32) (2) 512-9941  
TELEPHONE NO. (32) (2) 512-5519**

DATE: 1/26 \_\_\_\_\_

TO: WMFO \_\_\_\_\_

ATTN: SSA [REDACTED] BCCI \_\_\_\_\_

FAX NUMBER: \_\_\_\_\_ 202/-324-9335 \_\_\_\_\_

TOTAL NUMBER OF PAGES INCLUDING COVER PAGE: \_\_\_\_\_ 5 \_\_\_\_\_

b6  
b7C

SPECIAL NOTES/INSTRUCTIONS:

29B-WF-171994 Sub W-12

SEARCHED	INDEXED
SERIALIZED	FILED
JAN 26 1993	
FBI - WASH. FIELD OFFICE	

FBI

## TRANSMIT VIA:

☒ Teletype  
☐ Facsimile  
☐ AIRTEL

## PRECEDENCE:

☒ Immediate  
☐ Priority  
☐ Routine

## CLASSIFICATION:

☐ TOP SECRET  
☐ SECRET  
☐ CONFIDENTIAL  
☐ UNCLAS E F T O  
☒ UNCLAS

Date 1/26/93

FM LEGAT BRUSSELS (29B-WF-171994) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (BCCI) VIA FACSIMILE DIRECT/IMMEDIATE/

BT

UNCLAS

CITE: //5220:BL958.026 26 JAN 93//

PASS: FBIHQ FOR OLIA, FLU 1; CID/WCC/FIFU, ATTN: SSA  WMFO: SSA  BCCI.

SUBJECT: HIDDEN INTERESTS; MAJOR CASE #38; FIF; FAG; OO:  
 WMFO.

b6  
 b7C

RE WMFO TELETYPE TO BRUSSELS, 1/21/93 AND BRUSSELS  
 TELCALL TO WMFO, 1/25/93.

ON 1/22/93, ALAT BRUSSELS TELEPHONED   
 PUBLIC PROSECUTOR, ROTTERDAM, NETHERLANDS, BUT WAS UNABLE TO  
 MAKE CONTACT. ON 1/25/93,  RETURNED CALL AND ADVISED  
 THAT HE WILL ASK THE JUDGE OF INSTRUCTION (J/I) (MAGISTRATE)

29B-WF-171994

Approved: *[Signature]*Original filename: BRU 958 W. 026

Time Received: \_\_\_\_\_

Telprep filename: BRU 958 50.026MRI/JULIAN DATE: 026

ISN: \_\_\_\_\_

FOX DATE &amp; TIME OF ACCEPTANCE: \_\_\_\_\_

25 JAN '93 18:23 AM EMB BRUSSELS LEGAL ATTACHE P.3/3  
^PAGE 2 BL 29B-WF-171994 UNCLAS

FOR A SEIZURE ORDER (MUCH LIKE A U.S. SEARCH WARRANT) FOR THE RECORDS OF ERNEST AND YOUNG IN ROTTERDAM BECAUSE HE BELIEVES THAT IT "WILL NOT GO EASILY" AND THAT THERE WILL BE SOME "SKIRMISHES"; HE HAS THEREFORE CHOSEN THE STRONGEST LEGAL TACTIC IN THE HOPE OF PERHAPS NEGOTIATING COOPERATION.

[ ] ALSO ADVISED THAT HIS COUNTERPART IN AMSTERDAM, [ ] WILL DO LIKEWISE FOR THE RECORDS OF ETRISCO. [ ] STATED THAT HE AND [ ] HAVE MADE COORDINATED PLANS TO EXECUTE THE ORDER WITH THEIR RESPECTIVE JUDGES OF INSTRUCTION FOR FEBRUARY 2, 1993. [ ] STATED THAT THIS DAY WAS FIXED IN ADVANCE BECAUSE OF THE BUSY SCHEDULE OF THE J/I'S. [ ] STATED THAT HE WOULD CALL [ ] [ ] AND ASK HIM TO CALL LEGAT; AS OF THE TIME OF THIS COMMUNICATION, [ ] HAS NOT CALLED SO BRUSSELS HAS INITIATED CONTACT BUT WITH NO RESPONSE AS YET.

[ ] SAID THAT THE DOCUMENTS, GIVEN THE WORDING OF THE U.S. REQUEST, ARE NOT EASILY IDENTIFIED AND ANTICIPATES THAT THERE WILL BE LABORIOUS TASK LOOKING THROUGH THEM. [ ] STATED THAT THE SEIZURE WILL BE EFFECTED WHEN THE J/I AND HE WILL PHYSICALLY GO TO THE AUDITORS' PREMISES AND DEMAND THE

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^PAGE 3 BL 29B-WF-171994 UNCLAS

PRODUCTION THERE. [ ] EXPECTS THAT THIS WILL "TAKE SOME HOURS" AND THAT IT WOULD BE USEFUL TO HAVE AN AGENT FAMILIAR WITH THE INVESTIGATION THERE; [ ] MADE REFERENCE TO SA [ ] ALSO POINTED OUT THAT AN AGENT OF SIMILAR EXPERTISE SHOULD BE PRESENT IN AMSTERDAM WHEN [ ] AND HIS J/I EFFECT THEIR PRESENTATION.

[ ] STATED THAT THE J/I WILL HOLD NO HEARING AND WILL "CALL NO WITNESSES TO GIVE TESTIMONY." THE J/I WILL SIMPLY CERTIFY THAT THE COPIES OF DOCUMENTS RETRIEVED FOR EVIDENCE ARE, IN FACT, TRUE AND ACCURATE COPIES OF THE ORIGINAL DOCUMENT.

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BASED ON HIS DISCUSSION WITH [ ] ALAT BRUSSELS BELIEVES THAT AT LEAST TWO WMFO AGENTS, IF NOT MORE, WILL BE REQUIRED TO EFFECTIVELY COMPLETE THE TASK AS DESCRIBED IN RE TELCALL. BRUSSELS WILL PROCEED TO MAKE APPROPRIATE HOTEL RESERVATIONS FOR SA [ ] AS PREVIOUSLY DISCUSSED, UACB.

WMFO AT WASHINGTON, D.C.: ADVISE BRUSSELS OF TRAVEL ITINERARY OF SA [ ] AND ANY OTHER SA(S) WHO MAY ACCOMPANY HIM.



^PAGE 4 BL 29B-WF-171994 UNCLAS

LEGAT BRUSSELS AT THE HAGUE AND AMSTERDAM, THE  
NETHERLANDS. WILL OBTAIN NECESSARY COUNTRY CLEARANCE(S) AND  
HOTEL RESERVATIONS. WILL CONTACT PUBLIC PROSECUTOR,  
AMSTERDAM, TO INSURE COORDINATION OF DUTCH ASSISTANCE.

BT

29B-WF-171994

As of 02/05/93:

<u>DANY</u> <u>WITNESS NAME</u>	<u>DATE OF FBI</u> <u>INTERVIEW</u>	<u>302 TO</u> <u>DANY</u>	<u>NOTES TO</u> <u>DANY</u>	<u>LOG#</u>
	10/22/91-		01/13/93	90
	10/23/91			
	03/12/92			243
	07/08/92		01/13/93	444
	08/05/92			441
	02/12/92			175
	02/12/92			329
	02/12/92			353
	02/21/92		01/13/93	374
	08/28/91			214
	02/26/92			426
	06/08/92		01/13/93	436
	10/02/91			182
	05/15/92			388
	05/29/91& 05/31/91		01/13/93	24
	08/01/91		01/13/93	43
	08/14/91		01/13/93	48
	12/06/91		01/13/93	135
	01/29/92			237
11/14/91			251	

b6  
b7C

29B-WF-17994 -13  
Sub W

29B-WF-171994

2

<u>DANY WITNESS NAME</u>	<u>DATE OF FBI INTERVIEW</u>	<u>302 TO DANY</u>	<u>NOTES TO DANY</u>	<u>LOG#</u>
	08/14/91			333
	09/04/91			220
	05/12/92		01/13/93	385
	07/20/92			483
	06/09/92		01/13/93	401
	06/18/92		01/13/93	457
	12/02/92			503
	04/28/92		01/13/93	371
	07/27/92		01/13/93	482
	09/05/91		01/13/93	59
	11/11/91- 11/15/91		01/13/93	424
	11/12/91			117
	12/02/91- 12/??/91		01/13/93	394
	01/16/92		01/13/93	377
	07/10/92		01/13/93	446
	10/23/91		01/13/93	249
	03/10/92			242
	08/29/91			215
	02/26/92		01/13/93	178
	06/03/92		01/13/93	411
	05/06/92		01/13/93	399
	09/07/91			60

b6  
b7C

29B-WF-171994

3

<u>DANY WITNESS NAME</u>	<u>DATE OF FBI INTERVIEW</u>	<u>302 TO DANY</u>	<u>NOTES TO DANY</u>	<u>LOG#</u>
	08/08/91		01/13/93	45
	01/09/92- 01/10/92		01/13/93	254
	05/11/92- 05/12/92		01/13/93	432
	05/22/92 & 06/02/92		01/13/93	434
	07/13/92		01/13/93	463
	10/27/92		01/13/93	490
	12/11/91			137
	08/27/92			501
	04/14/92			205
	07/22/91			36
	08/01/91			42
	11/03/92		01/13/93	430
	10/01/91			78
	03/20/92		01/13/93	261
	07/10/92		01/13/93	
	07/10/92			464
	01/29/92		01/13/93	167
	08/29/91			216
	05/29/91		01/13/93	25
	09/18/92			480
	07/31/91		01/13/93	41

b6  
b7C

29B-WF-171994

4

<u>DANY WITNESS NAME</u>	<u>DATE OF FBI INTERVIEW</u>	<u>302 TO DANY</u>	<u>NOTES TO DANY</u>	<u>LOG#</u>
	08/14/91		01/13/93	47
	08/15/91			49
	08/28/91			334
	01/31/92			253
	02/28/92		01/13/93	183
	10/03/91		01/13/93	82
	10/23/91			232
	10/23/91			338
	09/19/91		01/13/93	66
	08/25/92		01/13/93	496
	10/01/91		01/13/93	79
	05/10/91			22
	04/14/92			202
	05/20/92			378
	01/15/92		01/13/93	236
	04/28/92		01/13/93	370
	07/27/92		01/13/93	481
	10/18/91			89
	01/02/92			
	05/22/92		01/13/93	407
	02/26/92			427

b6  
b7C

# Memorandum



To : SAC, WMFO (29B-WF-171994)

Date 2/9/93

From :

A

b6  
b7C

Subject: HIDDEN INTERESTS;  
MAJOR CASE 38;  
OO: WMFO

Set forth below is a listing of interview notes sent to the District Attorney New York (DANY) by the writer. Said notes were requested by DANY.

Date Sent to DANY	Interviewee	Interview Date
12/16/92	[REDACTED]	3/19/92
12/16/92	[REDACTED]	5/13/92
(The above notes were sent to DANY per the request of Investigator [REDACTED] and DOJ Trial Attorney [REDACTED] in furtherance of the [REDACTED] investigation).		
1/ 6/93	[REDACTED]	10/23/91
(Also sent on 1/14/93)		
1/14/93	[REDACTED]	3/12/92
1/14/93		5/12/92
1/14/93		7/ 7/92
1/14/93		7/10/92
1/14/93		7/10/92
1/14/93		7/13/92
1/14/93		10/ 2/91
1/14/93		9/ 4/91
1/14/93		8/28/91
1/14/93		8/29/91
1/14/93		8/29/91
1/14/93		4/28/92
1/14/93		3/10/92
1/14/93		1/21/92
1/14/93		1/22/92
1/15/93	1/23/92	
1/15/93	1/31/92	
1/15/93	1/29/92	
1/15/93	4/28/92	

b6  
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(The above notes were sent to DANY pursuant to a request by DOJ Trial Attorney [REDACTED]. The notes were sent for trial discovery/preparation purposes).

-15

29B-WF-171994 Sub W

Attached hereto are the facsimile cover sheets for the notes sent to DANY.

1-WMFO

SEARCHED	INDEXED
SERIALIZED	FILED
FEB 9 1993	
FBI - WASH. FIELD OFFICE	



FBI HEADQUARTERS  
CRIMINAL INVESTIGATIVE DIVISION  
WHITE-COLLAR CRIMES SECTION  
OFFICE NUMBER: (202) 324-5590  
FAX NUMBER: (202) 324-6492

PRECEDENCE: IMMEDIATE

TO: DISTRICT ATTORNEY NEW YORK

DATE: 1-14-93

ATTN: [REDACTED]  
FACSIMILE NUMBER: 212-335-9807

FROM: [REDACTED]

# of pages including this one: 38

b6  
b7C

SUBJECT: [REDACTED] INT. NOTES (10-2-91)  
[REDACTED] INT. NOTES (9-4-91)  
[REDACTED] INT. NOTES (8-28-91)  
[REDACTED] INT. NOTES

Originator: [REDACTED]

SEARCHED _____	INDEXED _____
SERIALIZED _____	FILED _____
FEB 11 1993	
FBI-WASH. METRO FIELD OFFICE	



FBI HEADQUARTERS  
CRIMINAL INVESTIGATIVE DIVISION  
WHITE-COLLAR CRIMES SECTION  
OFFICE NUMBER: (202) 324-5590  
FAX NUMBER: (202) 324-6492

PRECEDENCE: IMMEDIATE

TO: DISTRICT ATTORNEY NEW YORK

DATE: 1-14-93

ATTN: [REDACTED]  
FACSIMILE NUMBER: 212-335-9807

FROM: [REDACTED]

b6  
b7C

# of pages including this one: 14

SUBJECT: [REDACTED] INTERVIEW NOTES 4/28/92

Originator: [REDACTED]

SEARCHED _____	INDEXED _____
SERIALIZED _____	FILED _____
FEB 1 1993	
FBI - WASH. METRO FIELD OFFICE	



\*\*TX CONFIRMATION REPORT \*\*

AS OF JAN 15 '93 8:51 PAGE.01

WHITE-COLLAR-CRIME

	DATE	TIME	TO/FROM	MODE	MIN/SEC	PGS	STATUS
01	1/15	08:44	2123359807	G3--S	06"29	14	OK



FBI HEADQUARTERS  
CRIMINAL INVESTIGATIVE DIVISION  
WHITE-COLLAR CRIMES SECTION  
OFFICE NUMBER: (202) 324-5590  
FAX NUMBER: (202) 324-6492

PRECEDENCE: IMMEDIATE

TO: DISTRICT ATTORNEY NEW YORK

DATE: 1-14-93

ATTN: [REDACTED]  
FACSIMILE NUMBER: 212-335-9807

FROM: [REDACTED]

b6  
b7C

# of pages including this one: 23

SUBJECT: [REDACTED] INTERVIEW NOTES 3/10/92

Originator: [REDACTED]

SEARCHED	INDEXED
SERIALIZED	FILED
JAN 14 1993	
FBI-WASH. METRO FIELD OFFICE	

\*\* TX CONFIRMATION REPORT \*\*

AS OF JAN 14 '93 14:54 PAGE.01

WHITE-COLLAR-CRIME

DATE TIME  
01 1/14 14:44

TO/FROM  
2123359807

MODE  
G3--S

MIN/SEC PGS  
10"18 23

STATUS  
OK



FBI HEADQUARTERS  
CRIMINAL INVESTIGATIVE DIVISION  
WHITE-COLLAR CRIMES SECTION  
OFFICE NUMBER: (202) 324-5590  
FAX NUMBER: (202) 324-6492

PRECEDENCE: IMMEDIATE

TO: DISTRICT ATTORNEY NEW YORK

DATE: 1-14-93

ATTN: [REDACTED]  
FACSIMILE NUMBER: 212-335-9807

FROM: [REDACTED]

b6  
b7C

# of pages including this one: 25

SUBJECT: [REDACTED] INTERVIEW (3/12/92)

Originator: [REDACTED]

SEARCHED	INDEXED
SERIALIZED	FILED
JAN 15 1993	
FBI - WASH. METRO FIELD OFFICE	

\*\* TX CONFIRMATION REPORT \*\*

AS OF JAN 14 '93 15:13 PAGE.01

WHITE-COLLAR-CRIME

	DATE	TIME	TO/FROM	MODE	MIN/SEC	PGS	STATUS
01	1/14	15:00	2123359807	G3--S	12"23	25	OK



FBI HEADQUARTERS  
CRIMINAL INVESTIGATIVE DIVISION  
WHITE-COLLAR CRIMES SECTION  
OFFICE NUMBER: (202) 324-5590  
FAX NUMBER: (202) 324-6492

PRECEDENCE: IMMEDIATE

TO: DISTRICT ATTORNEY NEW YORK

DATE: 1-14-93

ATTN: [REDACTED]  
FACSIMILE NUMBER: 212-335-9807

FROM: [REDACTED]

b6  
b7C

# of pages including this one: 14

SUBJECT: [REDACTED] INTERVIEW NOTES  
(5-12-92) (7-7-92) (7-10-92)

Originator: [REDACTED]

SEARCHED _____	INDEXED _____
SERIALIZED _____	FILED _____
JAN 14 1993	
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FBI HEADQUARTERS  
CRIMINAL INVESTIGATIVE DIVISION  
WHITE-COLLAR CRIMES SECTION  
OFFICE NUMBER: (202) 324-5590  
FAX NUMBER: (202) 324-6492

PRECEDENCE: IMMEDIATE

TO: DISTRICT ATTORNEY NEW YORK

DATE: 1-14-93

ATTN: [REDACTED]  
FACSIMILE NUMBER: 212-335-9807

FROM: [REDACTED]

# of pages including this one: 1

SUBJECT: [REDACTED] INTERVIEW NOTES (7-10-92)  
INTERVIEW NOTES (7-13-92)

b6  
b7C

Originator: [REDACTED]

SEARCHED	INDEXED
SERIALIZED	FILED
JAN 14 1993	
FBI - NEW YORK	

\*\* TX CONFIRMATION REPORT \*\*

AS OF JAN 14 '93 15:47 PAGE.01

WHITE-COLLAR-CRIME

	DATE	TIME	TO/FROM	MODE	MIN/SEC	PGS	STATUS
01	1/14	15:41	2123358807	G3--S	05"57	14	OK





FBI HEADQUARTERS  
CRIMINAL INVESTIGATIVE DIVISION  
WHITE-COLLAR CRIMES SECTION  
OFFICE NUMBER: (202) 324-5590  
FAX NUMBER: (202) 324-6492

PRECEDENCE: IMMEDIATE

TO: DISTRICT ATTORNEY NEW YORK  
ATTN: [REDACTED]

DATE: 1-6-93

FACSIMILE NUMBER: 212-335-9807

FROM: [REDACTED]

# of pages including this one: 10

b6  
b7C

SUBJECT: [REDACTED] & INTERVIEW NOTES

Originator: [REDACTED]

SEARCHED _____	INDEXED _____
SERIALIZED _____	FILED _____
FEB 11 1993	
FBI - WASH. METRO FIELD OFFICE	



FBI HEADQUARTERS  
CRIMINAL INVESTIGATIVE DIVISION  
WHITE-COLLAR CRIMES SECTION  
OFFICE NUMBER: (202) 324-5590  
FAX NUMBER: (202) 324-6492

PRECEDENCE: IMMEDIATE

TO: DISTRICT ATTORNEY NEW YORK

DATE: 1-14-93

ATTN: [REDACTED]  
FACSIMILE NUMBER: 212-335-9807

FROM: [REDACTED]

1-15-93 sent out

# of pages including this one: 23

b6  
b7C

SUBJECT: [REDACTED] (4/28/92)

Originator: [REDACTED]

SEARCHED	INDEXED
SERIALIZED	FILED
FBI - WASH. FIELD OFFICE	

++ TX CONFIRMATION REPORT ++

AS OF JAN 15 '93 8:36 PAGE.01

WHITE-COLLAR-CRIME

	DATE	TIME	TO FROM	MODE	MIN	SEC	PGS	STATUS
01	1-15	08:26	2123359807	G3--S	10	41	23	OK



FBI HEADQUARTERS  
CRIMINAL INVESTIGATIVE DIVISION  
WHITE-COLLAR CRIMES SECTION  
OFFICE NUMBER: (202) 324-5590  
FAX NUMBER: (202) 324-6492

PRECEDENCE: IMMEDIATE

TO: DISTRICT ATTORNEY NEW YORK

DATE: 1-14-93

ATTN: [redacted]  
FACSIMILE NUMBER: 212-335-9807

1-15-93 Sent out

FROM: [redacted]

# of pages including this one: 12

b6  
b7C

SUBJECT: [redacted] INTERVIEW NOTES (1-31-92)  
(1-29-92)

Originator: [redacted]

SEARCHED	INDEXED
SERIALIZED	FILED
JAN 15 1993	
FBI NEW YORK FIELD OFFICE	

\*\* TX CONFIRMATION REPORT \*\*

AS OF JAN 15 '93 8:43 PAGE.01

WHITE-COLLAR-CRIME

DATE	TIME	TO/FROM	MODE	MIN/SEC	PGS	STATUS
01	1/15 08:37	2123359807	G3--S	05"17	12	OK



FBI HEADQUARTERS  
CRIMINAL INVESTIGATIVE DIVISION  
WHITE-COLLAR CRIMES SECTION  
OFFICE NUMBER: (202) 324-5590  
FAX NUMBER: (202) 324-6492

PRECEDENCE: IMMEDIATE

TO: DISTRICT ATTORNEY NEW YORK

DATE: 1-14-93

ATTN: [redacted]

FACSIMILE NUMBER: 212-335-9807

FROM: [redacted]

b6  
b7C

# of pages including this one: 58

Continuation

SUBJECT: [redacted] INTERVIEW NOTES

(1-21-92) (1-22-92) (1-23-92)

Originator: [redacted]

SEARCHED _____	INDEXED _____
SERIALIZED _____	FILED _____
FEB 11 1993	
FBI - WASH. METRO. FIELD OFFICE	

\*\* TX CONFIRMATION REPORT \*\*

AS OF JAN 14 '93 18:31 PAGE.01

WHITE-COLLAR-CRIME

DATE	TIME	TO/FROM	MODE	MIN/SEC	PGS	STATUS
01	1/14 18:00	2123359807	G3--S	31"16	39	INC

\*\* TX CONFIRMATION REPORT \*\*

AS OF JAN 14 1993 18:43 PAGE.01

WHITE-COLLAR-CRIME

	DATE	TIME	TO/FROM	MODE	MIN/SEC	PGS	STATUS
01	1/14	18:37	2123359807	G3--S	06"23	15	OK





FBI HEADQUARTERS  
CRIMINAL INVESTIGATIVE DIVISION  
WHITE-COLLAR CRIMES SECTION  
OFFICE NUMBER: (202) 324-5590  
FAX NUMBER: (202) 324-6492

PRECEDENCE: PRIORITY

TO:

DATE: 12-16-92

FACSIMILE NUMBER: 212-335-9807

b6  
b7C

FROM:

# of pages including this one: 15

SUBJECT:  NOTES

Originator: \_\_\_\_\_

SEARCHED _____	INDEXED _____
SERIALIZED _____	FILED _____
DEC 16 1992	
FBI - WASH. METRO FIELD OFFICE	

\*\* TX CONFIRMATION REPORT \*\*

AS OF DEC 16 '92 18:49 PAGE.01

WHITE-COLLAR-CRIME

DATE TIME  
12/16 18:42

TO/FROM  
2123359807

MODE  
G3--S

MIN/SEC PGS  
07"10 15

STATUS  
OK



FBI HEADQUARTERS  
CRIMINAL INVESTIGATIVE DIVISION  
WHITE-COLLAR CRIMES SECTION  
OFFICE NUMBER: (202) 324-5590  
FAX NUMBER: (202) 324-6492

PRECEDENCE: PRIORITY

TO: [REDACTED]

DATE: 12-16-92

FACSIMILE NUMBER: 212-335-9807

FROM: [REDACTED]

b6  
b7C

# of pages including this one: 10

SUBJECT: [REDACTED] NOTES / ATTORNEYS BUSINESS CARDS

Originator: \_\_\_\_\_

SEARCHED _____	INDEXED _____
SERIALIZED _____	FILED _____
DEC 17 1992	
FBI-WASH. METRO FIELD OFFICE	

AS OF DEC 16 '92 18:41 PAGE 01

DATE TIME

TO/FROM

MODE

MIN/SEC PGS

STATUS

01 12.16 18:37

2123359807

63--5

04 " 34 : 10

OK

- 1 -

## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 2/11/93

[redacted]  
Manhattan Porsche, 11617 Old Georgetown Road, Rockville, Maryland, (301) 881-0900, was contacted at his place of employment. After being advised as to the identity of the interviewing agent and the nature of the interview, [redacted] furnished the following information:

Several years ago, Manhattan Porsche sold [redacted] a 1984 Jaguar. [redacted] recalls the transaction due to its unusual financing. It was paid for with a wire transfer from Abu Dhabi. Manhattan Porsche continues to service [redacted] Jaguar and a 1979 Porsche with Maryland tag [redacted]. The [redacted] did not purchase the Porsche from Manhattan Porsche. [redacted] believes the Porsche was originally registered to [redacted] in California and later shipped to her after her marriage to [redacted].

b6  
b7C

Investigation on 2/11/93 at Rockville, MD File # 29B-WF-171994 Sub W

by [redacted] Date dictated 2/11/93

FBI

## TRANSMIT VIA:

☐ Teletype  
☐ Facsimile  
☒ AIRTEL

## PRECEDENCE:

☐ Immediate  
☐ Priority  
☐ Routine

## CLASSIFICATION:

☐ TOP SECRET  
☐ SECRET  
☐ CONFIDENTIAL  
☐ UNCLAS E F T O  
☐ UNCLAS

Date 2/11/93

TO : SAC, WMFO  
 FROM : SAC, ATLANTA (29B-WF-171994) (P)  
 SUBJECT : HIDDEN INTERESTS;  
 MC 38;  
 OO: WMFO

Reference WMFO Teletype to Atlanta, dated 2/3/93.

Enclosed, under separate cover, are the following documents:

FD-302 and notes of 10/18/91 interview of [redacted]  
 [redacted] (SA [redacted] s notes),  
 FD-302 and notes of 5/12/92 interview of [redacted]  
 [redacted] (SA [redacted] notes),  
 FD-302 and notes of 2/12/92 interview of [redacted]  
 [redacted] (morning session, SA [redacted]  
 notes),  
 FD-302 and notes of 2/12/92 interview of [redacted]  
 [redacted] (afternoon session, SA [redacted]  
 notes),  
 notes of 10/23/91 interview of [redacted] (SA  
 [redacted] notes),  
 notes of 8/28/91 interview of [redacted] (SA  
 [redacted] notes),  
 notes of 2/12/92 interview of [redacted]  
 [redacted] (SA [redacted] notes).

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(2) - WMFO (Enc. 11)  
 (1 - Package Copy)  
 1 - Atlanta

(3)

29B-WF-171994 sub W - 17

SEARCHED <u>Sw</u>	INDEXED <u>Sw</u>
SERIALIZED <u>Sw</u>	FILED <u>Sw</u>
FEB 12 1993	
FBI - V. SH. FIELD OFFICE	

Approved: DCT/TATransmitted 302 p to GWD

(Number)

(Time)

Per \_\_\_\_\_

SA [ ] has reviewed the Atlanta case file 29B-WF-171994 for interviews of [ ] and [ ]. [ ] was interviewed only once by SA [ ] and the FD-302 and notes are enclosed. SA [ ] interviewed [ ] on one occasion and the FD-302 and notes are enclosed. [ ] was interviewed by SA [ ] on 2/12/92. The interview was broken up into 2 different sessions and 2 FD-302s were created. Both these 2 FD-302s and notes are enclosed. It should be noted that [ ]

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[ ] During the interview, [ ] was less than forth coming in response to Agent's questions and subsequently, [ ] was indicted in the Northern District of Georgia. [ ] trial has been set in Atlanta, Georgia and is scheduled to commence on 3/15/93.

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Contained in a letter from [ ] to ADA [ ] [ ], and New York receipt confirmed by [ ] the following documents have already been provided to New York: an FD-302 reflecting the interview of [ ] on 2/12/92 by SA [ ], an IRS Memorandum of Interview (MOI) of the 10/23/91 interview of [ ] plus the IRS Agent's notes, the MOI of the 8/28/91 interview of [ ] and the IRS Agent's notes and the MOI of the 8/14/91 [ ] interview and the notes of the IRS Agent and SA [ ] notes. The only requested documents in the WMFO Teletype that SA [ ] has failed to provide to New York are the 2/12/92 [ ] notes, the 8/28/91 [ ] notes, and the 10/23/91 [ ] notes which all have been enclosed with this communication.

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29B-WF-171994

As of 02/17/93:

<u>DANY WITNESS NAME</u>	<u>DATE OF FBI INTERVIEW</u>	<u>302 TO DANY</u>	<u>NOTES TO DANY</u>	<u>LOG#</u>
	10/22/91- 10/23/91		01/13/93	90
	03/12/92			243
	07/08/92		01/13/93	444
	08/05/92			441
	02/12/92			175
	02/12/92			329
	02/12/92			353 (WF)
	02/12/92			505 (AT)
	02/21/92		01/13/93	374
	08/28/91			214
	02/26/92			426
	06/08/92		01/13/93	436
	10/02/91			182
	05/15/92			388
	05/29/91& 05/31/91		01/13/93	24
	08/01/91		01/13/93	43
	08/14/91		01/13/93	48
	12/06/91		01/13/93	135
	01/29/92			237

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29B-WF-171994 Sub W-18



29B-WF-171994

2

<u>DANY WITNESS NAME</u>	<u>DATE OF FBI INTERVIEW</u>	<u>302 TO DANY</u>	<u>NOTES TO DANY</u>	<u>LOG#</u>
	11/14/91			251
	09/04/91			220
	05/12/92		01/13/93	385 (WF)
	05/12/92			507 (AT)
	07/20/92			483
	06/09/92		01/13/93	401
	06/18/92		01/13/93	457
	12/02/92			503
	04/28/92		01/13/93	371
	07/27/92		01/13/93	482
	09/05/91		01/13/93	59
	11/11/91- 11/15/91		01/13/93	424
	11/12/91			117
	12/02/91- 12/??/91		01/13/93	394
	01/16/92		01/13/93	377
	07/10/92		01/13/93	446
	02/11/93			506
	10/23/91		01/13/93	249
	03/10/92			242
	08/29/91			215
	02/26/92		01/13/93	178
	06/03/92		01/13/93	411

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29B-WF-171994

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<u>DANY WITNESS NAME</u>	<u>DATE OF FBI INTERVIEW</u>	<u>302 TO DANY</u>	<u>NOTES TO DANY</u>	<u>LOG#</u>
	05/06/92		01/13/93	399
	09/07/91			60
	08/08/91		01/13/93	45
	01/09/92- 01/10/92		01/13/93	254
	05/11/92- 05/12/92		01/13/93	432
	05/22/92 & 06/02/92		01/13/93	434
	07/13/92		01/13/93	463
	10/27/92		01/13/93	490
	12/11/91			137
	08/27/92			501
	04/14/92			205
	07/22/91			36
	08/01/91			42
	11/03/92		01/13/93	430
	10/01/91			78
	03/20/92		01/13/93	261
	07/10/92		01/13/93	
	07/10/92			464
	01/29/92		01/13/93	167
	08/29/91			216

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<u>DANY WITNESS NAME</u>	<u>DATE OF FBI INTERVIEW</u>	<u>302 TO DANY</u>	<u>NOTES TO DANY</u>	<u>LOG#</u>
	05/29/91		01/13/93	25
	09/18/92			480
	07/31/91		01/13/93	41
	08/14/91		01/13/93	47
	08/15/91			49
	08/28/91			** (IRS)
	01/31/92			253
	02/28/92		01/13/93	183
	10/03/91		01/13/93	82
	10/23/91			232
	10/23/91			** (IRS)
	09/19/91		01/13/93	66
	08/25/92		01/13/93	496
	10/01/91		01/13/93	79
	05/10/91			22
	04/14/92			202
	05/20/92			378
	01/15/92		01/13/93	236
	04/28/92		01/13/93	370
	07/27/92		01/13/93	481

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\*\* = Joint interview, reported on IRS Memorandum of Interview;  
FBI only took notes.

29B-WF-171994

5

<u>DANY WITNESS NAME</u>	<u>DATE OF FBI INTERVIEW</u>	<u>302 TO DANY</u>	<u>NOTES TO DANY</u>	<u>LOG#</u>
<div></div>	10/18/91			89
	05/22/92		01/13/93	407
	02/26/92			427

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[REDACTED] 29B-WF-171994 Sub W

(1)

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The following investigation investigation was conducted at Falls Church, Virginia, on February 23, 1993:

Documents obtained from [REDACTED] were reviewed. Review noted references to a Porsche being purchased by BCCI for [REDACTED] for the sum of \$43,843.70 at MANHATTAN PORSCHE in 1984.

[REDACTED] MANHATTAN PORSCHE, Rockville, Maryland, advised that the above purchase was for a Jaguar, not a Porsche.

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Sub W

29B-WF-171994-19

SEARCHED	INDEXED
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MAR 1 1993	
FBI - WASH. METRO FIELD OFFICE	

U.S. Department of Justice



Federal Bureau of Investigation

In Reply, Please Refer to  
File No. 29B-WF-171994

1900 Half Street  
Washington D. C. 20535  
March 3, 1993

[Redacted]  
Assistant District Attorney  
County of New York  
1 Hogan Place  
New York, New York 10013

b6  
b7C

Dear [Redacted]:

Re: Your letters to SSA [Redacted]  
[Redacted] dated November 13,  
1992, and January 19, 1993.

Enclosed herewith are photocopies (1 each) of 17  
Federal Bureau of Investigation (FBI) reports of interviews (FD-  
302s), and 25 sets of interview notes, pursuant to your requests  
in the referenced letters. All of the enclosures are delineated  
in the following lists:

FD-302s

<u>INTERVIEWEE</u>	<u>DATE</u>	<u>INTERVIEWEE</u>	<u>DATE</u>
[Redacted]	05/15/92	[Redacted]	05/22/92 &
	05/12/92		06/02/92
	07/20/92		10/27/92
	06/09/92		08/27/92
	06/18/92		04/14/92
	07/27/92		03/20/92
	11/11/91-		09/18/92
	11/15/91		08/25/92
	12/02/91-		07/27/92
	12/09/91		
	05/11/92-		
	05/12/92		

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Searched \_\_\_\_\_  
Serialized SW  
Indexed \_\_\_\_\_  
Filed SW

INTERVIEW NOTES

<u>INTERVIEWEE</u>	<u>DATE</u>	<u>INTERVIEWEE</u>	<u>DATE</u>
[Redacted]	02/12/92	[Redacted]	11/14/91
	02/26/92		05/12/92
	10/02/91		07/20/92
	05/15/92		12/02/92
			12/11/91

- 20

29B-WF-171994 Sub-N

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1 - Each addressee

① - WMFO

[Redacted]

(4)

29B-WF-171994

<u>INTERVIEWEE</u>	<u>DATE</u>	<u>INTERVIEWEE</u>	<u>DATE</u>
	08/27/92		05/10/91
	04/14/92		04/14/92
	10/01/91		05/20/92
	07/10/92		10/18/91
	09/18/92		02/26/92
	08/28/91		
	10/23/91		

With the foregoing material added to that which you received in previous submissions, you should now have a copy of everything you requested from the FBI. If you have any questions or need further assistance, please do not hesitate to call.

Very truly yours,

Robert M. Bryant  
Special Agent in Charge

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By:   
Supervisory Special Agent

Enclosures (42)

cc: Laurence A Urgenson  
Deputy Assistant Attorney General  
Criminal Division  
U.S. Department of Justice

Principal Deputy Chief  
Fraud Section, Criminal Division  
U.S. Department of Justice

DISTRICT ATTORNEY  
OF THE  
COUNTY OF NEW YORK  
ONE HOGAN PLACE  
NEW YORK N.Y. 10013  
(212) 335-9000

LRT M. MORGENTHAU  
District Attorney

## FAX DOCUMENT COVERSHEET

FAX # (212) 335-9807

Date: 3/3/93  
To: [REDACTED]  
Fax # 202-324-9335  
Location: FBI  
From: [REDACTED]  
Address: New York County District Attorney  
Room: 730 Fax # (212) 335-9807  
# of Pages: 4 Phone # [REDACTED]

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☒ URGENT ☐ ROUTINE

Message: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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29B-WF-171994 Sub W

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MAR 3 1993	
FBI — WASH. FIELD OFFICE	



TRIAL AREAS W/RELEVANT WITNESSES

[1] Representations to Bank Regulators

- 1)
- 2)
- 3)
- 4)
- 5)
- ?)



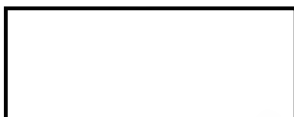
[2] Knowledge of Conspiracy

- 1)
- 2)
- 3)
- 4)



[3a] Bankers Trust Branches

- 1)
- 2)
- 3)

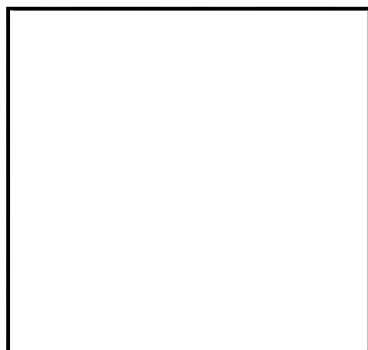


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[3b] Hiring - FAB, FABNY

PBOs:

- 4)
- 5)
- 6)
- 7)
- 8)
- 9)
- 10)
- 11)
- 12)
- 13)



[5] Structure of holding company as proposed and practised.

- 1)
- 2)
- 3)
- 4)
- 5)

-ATM

-Computers

-Lease at

[6] Nature and Extent of Communications

- 1) at C & W; rep. by

-legal bills

-travel records

-phone records

- 2)
- 3)
- 4)

[7] Joint Marketing

- 1)
- 2)
- 3)
- 4)

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[8] Capitalization

- 1)
- 2)
- 3)
- 4)
- 5)
- 6)
- 7)
- 8)
- 9)
- 10)

Federal Reserve witness (accountant)

Custodians - bank records (Credit Suisse)

?

[9] Clifford & loans

- 1)
- 2)

[10] NBG

- 1)
- 2)
- 3)

[11] Escambia-----

- 1)
- 2)
- 3)

[12] Suppression and Deception

- 1) (fall 1989 memo)
- 2)
- 3)
- 4)
- 5)
- 6)
- 7)
- 8)

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# Memorandum



To : SAC, WMFO (29B-WF-171994) (P)

Date 3/10/93



SSA [redacted]

b6  
b7C

Subject:

HIDDEN INTERESTS;  
MC #38;  
FIF; FAG;  
OO: WMFO

On 3/9/92, a status hearing was held before U.S. District Court Judge Joyce Hens Green, Washington, D.C., relating to preparations for the trial of subjects CLARK M. CLIFFORD and [redacted], scheduled to begin in her court on 6/1/93. The defendants were not present, but each had filed an affidavit waiving his right to be there.

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1-WMFO

Referral/Consult

(1)

29B-WF-171994 Sub W-23

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MAR 10 1993	
FBI - WASH. METRO	

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29B-WF-171994

Referral/Consult



[redacted] FBIHQ SSA [redacted] has been apprised  
and will also attend. It is suggested that, if possible, ASAC  
[redacted] and SSA [redacted] should also be present.

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DATE 3/10/93

HIDDEN INTERESTS

<div style="border: 1px solid black; width: 60px; height: 20px; display: inline-block;"></div> (C-5)	✓
<div style="border: 1px solid black; width: 120px; height: 20px; display: inline-block;"></div> (C-2)	✓
<div style="border: 1px solid black; width: 100px; height: 20px; display: inline-block;"></div> (C-8)	✓
<div style="border: 1px solid black; width: 140px; height: 20px; display: inline-block;"></div> (C-5)	✓
<div style="border: 1px solid black; width: 80px; height: 20px; display: inline-block;"></div> (C-2)	✓
<div style="border: 1px solid black; width: 80px; height: 20px; display: inline-block;"></div> (C-5)	✓
ASAC <div style="border: 1px solid black; width: 140px; height: 60px; display: inline-block;"></div>	<div style="border: 1px solid black; width: 100px; height: 90px; display: inline-block;"></div>
SSA	

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COMMENTS: Last recipient please  
send to file.  
Thanks!

Sub-W

29B-WF-171994-24

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<b>MAR 19 1993</b>	
FBI - WASH. METRO FIELD OFFICE	

SW

# Memorandum



To : SAC, WMFO (29B-WF-171994) (P)

Date 3/12/93



SSA



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Subject: HIDDEN INTERESTS;  
MC #38;  
FIF; FAG;  
(OO: WMFO)



Referral/Consult

①-WMFO (Enc. 1)



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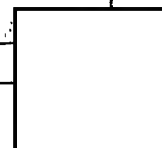


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29B-WF-171994-Sub-W-25

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MAR 10 1993	
FBI - WMFO	



# Memorandum



To : SAC, WMFO (29B-WF-171994) (P)

Date 3/17/93

From : SSA [redacted]

b6  
b7C

Subject: HIDDEN INTERESTS;  
MC #38;  
FIF; FAG;  
(OO: WMFO)

On this date, a hearing was held by U.S. District Court Judge Joyce Hens Green, in Washington, D.C. (WDC), primarily for the purpose of receiving oral arguments on motions before her in the upcoming (6/1/93) WDC trials of CLARK M. CLIFFORD and [redacted] (neither of whom was present). Judge Green will rule shortly on defense motions requesting her to compel the government to disclose (1) its intent to present "intent evidence" (Rule 404b) at trial, and (2) the existence and results of any electronic surveillance of the defendants. Likewise, she will rule on the government's motion to order the taking of depositions from foreign witnesses (at this point, [redacted] and two-to-six employees of ETRUSCO, a corporate director of CREDIT AND COMMERCE AMERICAN HOLDINGS).

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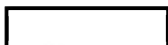
Judge Green further instructed the defense to submit a written motion for dismissal as to CLIFFORD by 3/31/93, and the government to respond to it by 4/7/93. CLIFFORD is scheduled for by-pass surgery on or about 3/22/93.



(X)

Referral/Consult

①-WMFO




(1)



29B-WF-171994 Sub W

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MAR 19 1993			
FBI - WASHINGTON			



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FEDERAL BUREAU OF INVESTIGATION  
WASHINGTON, D. C. 20535

4/7/93

YOUR FILE NO.  
FBI FILE NO. 29B-WF-171994 (P)  
LATENT CASE NO. L-1054

TO: SAC, WMFO

RE: HIDDEN INTERESTS;  
MC #38;  
FIF;  
FAG

REFERENCE: FBI, WMFO teletype 4/2/93 and District Attorney of  
the County of New York letter 4/2/93  
EXAMINATION REQUESTED BY: WMFO and District Attorney of the County of New  
SPECIMENS: York  
Copy of a three-page letter  
Business card

Eight latent fingerprints of value were developed on the  
letter and business card.

The latent fingerprints are not fingerprints of [redacted]  
[redacted], FBI # [redacted]

The specimens are enclosed, together with photographic  
copies of the specimens, which were made in the Latent  
Fingerprint Section.

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Enc. (4)

1 - District Attorney of the County of New York  
Attention: Assistant District Attorney [redacted]  
One Hogan Place  
New York, New York 10013

29B-WF-171994 Sub W  
-27

# Memorandum



To : SAC, WMFO (29B-WF-171994) (P)

Date 6/11/93



SSA [redacted] (BCCI C-5)

Subject: HIDDEN INTERESTS;  
MC #38;  
FIF; FAG;  
(OO: WMFO)

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On 6/10/93, DOJ Attorney/Advisor [redacted] reported that the trial of [redacted] in New York is continuing, with the testimony of BCCI-insider [redacted] slated to begin on 6/10/93, followed shortly thereafter by BCCI-nominees [redacted] and [redacted] and BCCI-insider [redacted]. I expect [redacted] testimony will last about a week. From my assessment of the NY witness list, it appears the prosecution is about 2/3-to-3/4 completed.

①-WMFO



(1)

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29B-WF-171994 Sub W-29

SSA [redacted] [redacted]

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JUN 11 1993	
FBI - [redacted]	



U.S. Department of Justice

Federal Bureau of Investigation

Washington, D.C. 20537

MAY 24 1993 2330

Contributor: 3<sup>rd</sup> Request

The enclosed fingerprints and/or correspondence are being returned to you because of the reason(s) indicated below:

- ☐ (Contributor) (Registration) (Service) number omitted.
- ☐ Incomplete descriptive data.
- ☐ Indicate correct sex of subject.
- ☐ Name (not shown at top of card) (name and signature differ).
- ☐ Date of birth (not given) (not clear) (incomplete). If unknown, give approximate age.
- ☐ Charge and/or date of arrest not given.
- ☐ Inked finger impressions not on card.
- ☐ Advise reason for submission of fingerprints; if criminal, furnish charge; or, if applicant, furnish position for which applying.
- ☐ FBI number omitted. Rolled impressions of all ten fingers, plus plain impressions, must be submitted if FBI number not available.
- ☐ Advise if subject is deceased.
- ☐ Furnish final disposition.
- ☐ Impressions not black on standard white fingerprint card stock.
- ☐ Apparently mailed to us by mistake.
- ☐ Our records fail to reveal a statute from your state requiring fingerprinting for the position indicated on the enclosed card(s).
- ☐ There is no indication the enclosed cards and/or correspondence have been processed through your state identification bureau of central agency prior to submission to the FBI.
- ☐ Enclosed card may have been submitted by your office. Please list contributor, and return to FBI. If not submitted by your office, please advise.
- ☐ We do not include information unsupported by fingerprints in our files.
- ☐ Finger impressions on attached card are identical with those on file for subject of attached record; however, the description data on the card evidently pertains to another individual.
- ☐ Descriptive data on attached fingerprint card is similar to that on file for subject of attached record; however, finger impressions are for another individual.
- ☐ Finger impressions are identical with those on file for subject of FBI No \_\_\_\_\_; however, name and description are similar to information on file of subject of FBI No \_\_\_\_\_.  
A copy of each record is attached.
- ☐ Search by name only has been conducted with negative results.
- ☐ Fingerprint search has been conducted with negative results.
- ☐ Essential information omitted; ☐ name, ☐ sex, ☐ descriptive data, ☐ DOB, ☐ fingerprints, ☐ person to be notified in case of emergency.
- ☐ Submit ten finger impression fingerprint card (refer to our letter to all fingerprint contributors dated 6/17/85, copy attached).
- ☐ Fingerprint card with nonserious offense/no arrest charges.
- ☐ Fingerprint card with missing/incorrect contributor's name and number.
- ☐ Fingerprint illegible - submit another fingerprint card.
- ☐ REJ/50 - Transaction received for processing matches NFF record from your state.
- ☐ REJ/51 - SID on file different than SID on print.
- ☐ REJ/52 - SID previously established for another FNU.
- ☐ REJ/53 - SID missing for NFF participant.
- ☒ Other 100 Old

After making appropriate changes and/or additions, please resubmit. Your cooperation is appreciated.

Identification Division

Enclosure(s)

-30

29B-WF-171994 Sub W

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FBI - WASH. FIELD OFFICE	
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LEAVE BLANK

TYPE OR PRINT ALL INFORMATION IN BLACK

FBI

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LAST NAME NAM

FIRST NAME

MIDDLE NAME 253

b6

b7C

CLIFFORD CLARK MC

STATE USAGE

ALIASES

CONTRIBUTOR  
ORIDCFBIWFOO

SIGNATURE OF PERSON FINGERPRINTED

Clifford M. CliffordFBI  
WFODATE OF BIRTH DOBMonth Day Year  
12-25-1906

THIS DATA MAY BE COMPUTERIZED IN LOCAL, STATE AND NATIONAL FILES

DATE ARRESTED OR RECEIVED DOA

SEX

RACE

HGT.

WGT.

EYES

HAIR

PLACE OF BIRTH POBDATE 7/31/92 SIGNATURE OF OFFICIAL TAKING FINGERPRINTS7/31/92MC6'2"175BLGRFT. SCOTT, KS

CHARGE

YOUR NO. OCA898-WK-171994FBI NO. FBI

LEAVE BLANK

133

CURE

232116 M 1 UIOI 5M 1 UIII

REF

923491089011 16031110051407100604

NCIC CLASS - FPC

FINAL DISPOSITION

SOCIAL SECURITY NO. SOC577-54-5387

CAUTION



1. R. THUMB

2. R. INDEX

3. R. MIDDLE

4. R. RING

5. R. LITTLE

6. L. THUMB

7. L. INDEX

8. L. MIDDLE

9. L. RING

10. L. LITTLE

LEFT FOUR FINGERS TAKEN SIMULTANEOUSLY

L. THUMB

R. THUMB

RIGHT FOUR FINGERS TAKEN SIMULTANEOUSLY

FEDERAL BUREAU OF INVESTIGATION, UNITED STATES DEPARTMENT OF JUSTICE  
WASHINGTON, D. C. 20537

*MNIS*

PALM PRINTS TAKEN? YES ☐ NO ☒  
PHOTO AVAILABLE? YES ☒ NO ☐

IF AVAILABLE, PASTE PHOTO OVER INSTRUCTIONS  
IN DOTTED AREA.

(DO NOT USE STAPLES)

SINCE PHOTOGRAPH MAY BECOME DETACHED INDICATE NAME,  
DATE TAKEN, FBI NUMBER, CONTRIBUTOR AND ARREST NUMBER  
ON REVERSE SIDE, WHETHER ATTACHED TO FINGERPRINT CARD OR  
SUBMITTED LATER.

IF ARREST FINGERPRINTS SENT FBI PREVIOUSLY AND FBI NO. UNKNOWN,  
FURNISH ARREST NO. \_\_\_\_\_ DATE \_\_\_\_\_

STATUTE CITATION (SEE INSTRUCTION NO. 9) CIT

1. Title 18 USC 371
2. Title 18 USC 1001
- 3.

ARREST DISPOSITION (SEE INSTRUCTION NO. 5) ADN

*PR Bond*

EMPLOYER: IF U. S. GOVERNMENT, INDICATE SPECIFIC AGENCY.  
IF MILITARY, LIST BRANCH OF SERVICE AND SERIAL NO.

OCCUPATION

*Retired*

RESIDENCE OF PERSON FINGERPRINTED

*9421 Rockville Pike*

*Bethesda, MD 20014*

SCARS, MARKS, TATTOOS, AND AMPUTATIONS SMT

BASIS FOR CAUTION ICO

DATE OF OFFENSE DOO

*7-29-92*

SKIN TONE SKN

*FAIR*

MISC. NO. MNU

ADDITIONAL INFORMATION

DUP. DSTY.

*8/22/92  
05054*

INSTRUCTIONS

1. UNLESS OTHERWISE PROVIDED BY REGULATION IN YOUR STATE, FINGERPRINTS ARE TO BE SUBMITTED DIRECTLY TO FBI IDENTIFICATION DIVISION. FORWARD IMMEDIATELY FOR MOST EFFECTIVE SERVICE.
2. FINGERPRINTS SHOULD BE SUBMITTED BY ARRESTING AGENCY ONLY (MULTIPLE PRINTS ON SAME CHARGE SHOULD NOT BE SUBMITTED BY OTHER AGENCIES SUCH AS JAILS, RECEIVING AGENCIES, ETC.). REQUEST COPIES OF FBI IDENTIFICATION RECORD FOR ALL OTHER INTERESTED AGENCIES IN BLOCK BELOW. GIVE COMPLETE MAILING ADDRESS, INCLUDING ZIP CODE.
3. TYPE OR PRINT ALL INFORMATION.
4. NOTE AMPUTATIONS IN PROPER FINGER BLOCKS.
5. LIST FINAL DISPOSITION IN BLOCK ON FRONT SIDE. IF NOT NOW AVAILABLE, SUBMIT LATER ON FBI FORM R-84 FOR COMPLETION OF RECORD. IF FINAL DISPOSITION NOT AVAILABLE SHOW PRE-TRIAL OR ARRESTING AGENCY DISPOSITION, e. g., RELEASED, NO FORMAL CHARGE, BAIL, TURNED OVER TO, IN THE ARREST DISPOSITION BLOCK PROVIDED ON THIS SIDE.
6. MAKE CERTAIN ALL IMPRESSIONS ARE LEGIBLE, FULLY ROLLED AND CLASSIFIABLE.
7. CAUTION - CHECK BOX ON FRONT IF CAUTION STATEMENT INDICATED. BASIS FOR CAUTION (ICO) MUST GIVE REASON FOR CAUTION, e. g., ARMED AND DANGEROUS, SUICIDAL, ETC.
8. MISCELLANEOUS NUMBER (MNU) - SHOULD INCLUDE SUCH NUMBERS AS MILITARY SERVICE, PASSPORT AND/OR VETERANS ADMINISTRATION (IDENTIFY TYPE OF NUMBER).
9. PROVIDE STATUTE CITATION, IDENTIFYING SPECIFIC STATUTE (example - PL for PENAL LAW) AND CRIMINAL CODE CITATION INCLUDING ANY SUB-SECTIONS.
10. ALL INFORMATION REQUESTED IS ESSENTIAL.

SEND COPY TO:

REPLY DESIRED?

YES ☐

NO ☒

(REPLY WILL BE SENT IN ALL CASES IF SUBJECT FOUND TO BE WANTED)

IF COLLECT WIRE OR COLLECT TELEPHONE REPLY  
DESIRED, INDICATE HERE: (WIRE SENT ON ALL UNKNOWN DECEASED)

WIRE REPLY ☐

TELEPHONE REPLY ☐

TELEPHONE NO. AND AREA CODE \_\_\_\_\_

LEAVE BLANK

LEAVE BLANK



U.S. Department of Justice

7th Floor  
Indt

Federal Bureau of Investigation

Washington, D.C. 20537

APR 27 1993 2330

Date:

Contributor:

The enclosed fingerprints and/or correspondence are being returned to you because of the reason(s) indicated below:

- ☐ (Contributor) (Registration) (Service) number omitted.
- ☐ Incomplete descriptive data.
- ☐ Indicate correct sex of subject.
- ☐ Name (not shown at top of card) (name and signature differ).
- ☐ Date of birth (not given) (not clear) (incomplete). If unknown, give approximate age.
- ☐ Charge and/or date of arrest not given.
- ☐ Inked finger impressions not on card.
- ☐ Advise reason for submission of fingerprints; if criminal, furnish charge; or, if applicant, furnish position for which applying.
- ☐ FBI number omitted. Rolled impressions of all ten fingers, plus plain impressions, must be submitted if FBI number not available.
- ☐ Advise if subject is deceased.
- ☐ Furnish final disposition.
- ☐ Impressions not black on standard white fingerprint card stock.
- ☐ Apparently mailed to us by mistake.
- ☐ Our records fail to reveal a statute from your state requiring fingerprinting for the position indicated on the enclosed card(s).
- ☐ There is no indication the enclosed cards and/or correspondence have been processed through your state identification bureau of central agency prior to submission to the FBI.
- ☐ Enclosed card may have been submitted by your office. Please list contributor, and return to FBI. If not submitted by your office, please advise.
- ☐ We do not include information unsupported by fingerprints in our files.
- ☐ Finger impressions on attached card are identical with those on file for subject of attached record; however, the description data on the card evidently pertains to another individual.
- ☐ Descriptive data on attached fingerprint card is similar to that on file for subject of attached record; however, finger impressions are for another individual.
- ☐ Finger impressions are identical with those on file for subject of FBI No \_\_\_\_\_; however, name and description are similar to information on file of subject of FBI No \_\_\_\_\_.  
A copy of each record is attached.
- ☐ Search by name only has been conducted with negative results.
- ☐ Fingerprint search has been conducted with negative results.
- ☐ Essential information omitted; ☐ name, ☐ sex, ☐ descriptive data, ☐ DOB, ☐ fingerprints, ☐ person to be notified in case of emergency.
- ☐ Submit ten finger impression fingerprint card (refer to our letter to all fingerprint contributors dated 6/17/85, copy attached).
- ☐ Fingerprint card with nonserious offense/no arrest charges.
- ☐ Fingerprint card with missing/incorrect contributor's name and number.
- ☐ Fingerprint illegible - submit another fingerprint card.
- ☐ REJ/50 - Transaction received for processing matches NFF record from your state.
- ☐ REJ/51 - SID on file different than SID on print.
- ☐ REJ/52 - SID previously established for another FNU.
- ☐ REJ/53 - SID missing for NFF participant.
- ☒ Other NO OB

After making appropriate changes and/or additions, please resubmit. Your cooperation is appreciated.

Identification Division

Enclosure(s)

b6  
b7C

29B-WF-171994 Sub-W

SEARCHED	INDEXED
SERIALIZED	FILED
JUN 17 1993	
FBI - WASH. FIELD	



DISTRICT ATTORNEY  
OF THE  
COUNTY OF NEW YORK  
ONE HOGAN PLACE  
NEW YORK, N.Y. 10013  
(212) 335-9000

ROBERT M. MORGENTHAU  
DISTRICT ATTORNEY

June 11, 1993

[Redacted]  
Special Agent  
Federal Bureau of Investigation  
7799 Leesburg Pike  
Falls Church, VA 22043

b6  
b7C

Re: People v. [Redacted] et al.  
N.Y. Co. Ind. No. 6994/92

Dear [Redacted]

Pursuant to our letter of November 13, 1992, please find enclosed a list of additional potential witnesses who the People may call to testify at the trial of the above captioned indictment. Once again we ask you to search your files and provide us with a copy of anything that constitutes a "statement" of any of the persons on the attached list.

We realize that this request will exact some burdens upon your organization. We appreciate the efforts that you make to provide this Office with possession of the indicated statements, and thank you in advance for your anticipated courtesy and promptness in carrying out our request. If you have any questions, please call me at (212) 335-9892. In any event, we would be grateful for a written response to our request from your agency.

Sincerely,

[Redacted Signature]

Assistant District Attorney

b6  
b7C

Enc.

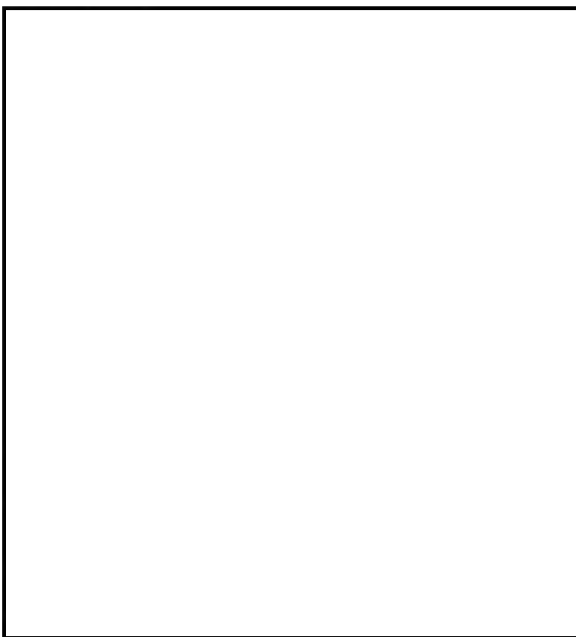
JWM:ccb

29B-WF-171994 Sub W - 31

SEARCHED <u>SW</u>	INDEXED <u>SW</u>
SERIALIZED <u>SW</u>	FILED <u>SW</u>
JUN 16 1993	
FBI - WASH. FIELD OFFICE	

6/11/93

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- 9.
- 10.



b6  
b7C



U.S. Department of Justice



Federal Bureau of Investigation

In Reply, Please Refer to  
File No. 29B-WF-171994

1900 Half Street  
Washington D. C. 20535  
June 16, 1993

[redacted]  
Assistant District Attorney  
County of New York  
1 Hogan Place  
New York, New York 10013

b6  
b7C

Dear [redacted]:

Re: Your letter of June 11, 1993

Pursuant to your request in the referenced letter,  
enclosed herewith are photocopies (1 each) of:

Two Federal Bureau of Investigation reports of  
investigation (FD-302s)--one on the 5/5/92 interview of [redacted]  
[redacted] the other on the 11/20/91 interview of  
[redacted]--and two sets of handwritten notes, one  
for each of the aforementioned FD-302s.

b6  
b7C

With regard to the other additional potential witnesses  
listed in your referenced letter, a review of our records  
indicated that, other than [redacted] and [redacted]  
(whose interview FD-302 and notes were sent to you with our  
letter of March 3, 1993), none of them was interviewed.

(V)

[redacted]  
Referral/Consult

If you need further assistance or have any questions,

1-Addressee (Enc. 5)  
①-WMFO (29B-WF-171994 SUB W)

[redacted]  
(3) (4)  
1- ADPAAG WURGENSON  
1- PDC [redacted]

29B-WF-171994 Sub W- 32

b6  
b7C

Searched \_\_\_\_\_  
Serialized Sw [redacted]  
Indexed \_\_\_\_\_  
Filed Sw [redacted]

29B-WF-171994

please do not hesitate to ask.

Very truly yours,

Robert M. Bryant  
Special Agent in Charge

By:   
Supervisory Special Agent

Enclosures (5)

cc: Laurence A. Urgenson  
Acting Deputy Assistant Attorney General  
Criminal Division  
U.S. Department of Justice

b6  
b7C

Principal Deputy Chief  
Fraud Section, Criminal Division  
U.S. Department of Justice

# Memorandum



To : Laurence A. Urgenson  
Acting Deputy Assistant Attorney General

Date 6/22/93

From : [REDACTED]  
Supervisory Special Agent

b6  
b7C

Subject: Proposed Suit by FAC/FAB Trustee  
Against UAE Principals, Et Al

Pursuant to your request at Jones Day on 6/18/93, for  
input on the captioned matter about such things as [REDACTED]

b5

[REDACTED]

[REDACTED]

b5

[REDACTED]

b5  
b6  
b7C

[REDACTED]

b5  
b6  
b7C

[REDACTED]

33  
b5

1-ADAAG Urgenson (via facsimile)  
1-WMFO (29B-WF-171994 Sub W)

[REDACTED] (2)

SSA [REDACTED]

[REDACTED]

b6  
b7C

29B-WF-171994 Sub W

SEARCHED	INDEXED
SERIALIZED <i>Sw</i>	FILED <i>Sw</i>
JUN 22 1993	
FBI - WASHINGTON	

[REDACTED]

29B-WF-171994



b5  
b6  
b7C

# Memorandum



To : SAC, WMFO (29B-WF-171994) (P)

Date 6/4/93

From : SSA [redacted] (BCCI C-5)

b6  
b7C

Subject: HIDDEN INTERESTS;  
MC #38;  
FIF; FAG;  
(OO: WMFO)



1-WMFO (att. 1)

Referral/Consult



(1)

4, 7, 10, 15-16,  
18-19, 27, 31, 46,  
83-84, 86, 90

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b7C

29B-WF-171994 Sub-W -34

SEARCHED <u>SW</u>	INDEXED <u>SW</u>
SERIALIZED <u>SW</u>	FILED <u>SW</u>
JUN 29 1993	
FBI — WASH. FIELD OFFICE	



U.S. Department of Justice



Federal Bureau of Investigation

In Reply, Please Refer to  
File No. 29B-WF-171994

1900 Half Street  
Washington D. C. 20535  
July 16, 1993

[redacted]  
Assistant District Attorney  
County of New York  
1 Hogan Place  
New York, New York 10013

Dear [redacted]:

Re: Preliminary list of  
defense witnesses provided to  
your office by letter from  
[redacted] dated  
June 25, 1993.

On July 8, 1993, via facsimile transmission, this office received a copy of the referenced communication from the Fraud Section of the U.S. Department of Justice, to whom it had been sent the previous day by Trial Attorney [redacted], requesting copies of any interview reports or notes relating to any of the persons on the list. In coordination with the Fraud Section's response to [redacted] request, enclosed herewith are photocopies (1 each) of:

b6  
b7C

The notes taken during the 4/16/92 interview of [redacted]  
[redacted]; and ten Federal Bureau of Investigation reports of investigation (FD-302):

INTERVIEWEE	DATE	INTERVIEWEE	DATE
[redacted]	07/21/92	[redacted]	07/20/92
	03/01/93		05/04/92
	10/01/92		07/20/92
	01/16/92		10/22/92
	03/11/93		12/02/92

(\* Contain information attributed to [redacted])

Notes taken during the 3/18/92 interview of [redacted]  
[redacted] will be forwarded to you under separate cover.

If you need further assistance or have any questions,

2-Addressee (ENC. 11)

1- each cc: (2)

①-WMED

29B-WF-171994 Sub W - 36

Searched SW

Serialized SW

Indexed SW

Filed SW

29B-WF-171994

please contact Special Agent [REDACTED] (202) 324-6408.

Very truly yours,

Robert M. Bryant  
Special Agent in Charge

By: [REDACTED]  
Supervisory Special Agent

b6  
b7C

Enclosures (11)

cc: Laurence A. Urgenson  
Acting Deputy Assistant Attorney General  
Criminal Division  
U.S. Department of Justice  
Washington, D.C. 20530

[REDACTED]  
Principal Deputy Chief  
Fraud Section, Criminal Division  
U.S. Department of Justice  
Washington, D.C. 20530  
(w/ enclosures)



U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to  
File No. 29B-WF-171994

1900 Half Street  
Washington D. C. 20535  
July 21, 1993

[redacted]  
Assistant District Attorney  
County of New York  
1 Hogan Place  
New York, New York 10013

Re: People v. [redacted] et al.  
N.Y. Co. Ind. No. 6994/92

Dear [redacted]:

Please find enclosed a copy of a Federal Bureau of  
Investigation report of investigation (FD-302) on the 6/24/92  
interview of [redacted]

b6  
b7C

On 7/20/93, the Fraud Section of the U.S. Department of  
Justice passed on to this office a request from Trial Attorney  
[redacted] for a report of the interview of [redacted].

If you need further assistance or have any questions,  
please do not hesitate to contact Special Agent [redacted]  
[redacted] (202) 324-6408.

Very truly yours,

Robert M. Bryant  
Special Agent in Charge

By: [redacted]  
Supervisory Special Agent

Enc

cc: Laurence A. Urgenson  
[redacted]

2-Addressee  
1-Urgenson  
1-[redacted]  
① 29B-WF-171994

(5)

29B-WF-171994 Sub W - 37

Searched	Serialized	Indexed	Filed
	544		
JUL 24 1993			
FEDERAL BUREAU OF INVESTIGATION			
U.S. DEPARTMENT OF JUSTICE			



C-5

TO: [REDACTED] UNIT CHIEF, FIFU

8/10/93

b6  
b7C

FR: SA [REDACTED] WMFO

RE: HIDDEN INTERESTS; MC #38: NY TRIAL STATUS

PER YOUR REQUEST 8/9/93, ON THE CAPTIONED MATTER:

IT HAD BEEN ANTICIPATED, DUE TO A RULING BY NY JUSTICE BRADLEY, THAT EACH SIDE WOULD BE RESTRICTED TO ONE DAY FOR ITS SUMMATION, BEGINNING WITH THE DEFENSE ON 8/4/93. IT SEEMS THAT THROUGHOUT THE TRIAL, HOWEVER, AT LEAST AS FAR AS THE DEFENSE HAS BEEN CONCERNED, JUSTICE BRADLEY'S RULINGS HAVE BEEN CONSTANTLY REVISED. CONSISTENT WITH THAT OBSERVATION, THE DEFENSE BEGAN ITS SUMMATION ON 8/4, BUT DID NOT FINISH UNTIL COB 8/6, THEREBY FORCING THE PROSECUTION TO WAIT THROUGH THE WEEKEND UNTIL 8/9 TO BEGIN.

WMFO CASE AGENT AND SUPERVISOR, ACCOMPANIED BY FIFU SSA [REDACTED], WERE IN ATTENDANCE IN NY ON 8/5; WMFO CA ATTENDED A.M. SESSION ON 8/6, WITH FIFU SSA [REDACTED], WHO REMAINED FOR THE REST OF 8/6. DURING THE TIME WHEN WMFO CA WAS THERE, THE DEFENSE DWELLED ON THE FOLLOWING ISSUES: (1) THAT, ALTHOUGH THE PROSECUTION HAD PRESENTED EVIDENCE TO SUPPORT THE ALLEGATION THAT BCCI WAS A THOROUGHLY-CORRUPT, INTERNATIONAL ENTERPRISE, THERE WAS NO EVIDENCE PRESENTED TO SHOW (A) THAT BCCI OWNED OR CONTROLLED FIRST AMERICAN BANK OR (B) THAT [REDACTED] OR CLARK CLIFFORD KNEW ABOUT, OR PARTICIPATED IN, ANY OF BCCI'S FRAUDULENT ACTIVITIES; (2) THAT [REDACTED] HAD NOT MADE ANY MATERIAL MISSTATEMENTS TO ANY STATE OR FEDERAL OFFICIAL; (3) THAT THE NON-RECOURSE LOANS WHICH [REDACTED] AND CLIFFORD RECEIVED FROM BCCI TO BUY CCAH STOCK (THE IMMENSE PROFITS FROM WHICH FORMED THE BASIS FOR THE [DISMISSED] COMMERCIAL BRIBERY COUNT) WERE STANDARD TRANSACTIONS DRAWN UP BY REGULATORY COUNSEL; THAT A "SINISTER SPIN" HAD BEEN PUT ON THEM BY THE PROSECUTION, WHICH, IT WAS ALLEGED, PRESENTED ONLY CERTAIN DOCUMENTS, IN A WAY MEANT TO DECEIVE THE JURY; (4) THAT THE REGULATORY OFFENSES CHARGED--THE OMISSION OF MATERIAL FACTS FROM FED "Y-6" FORMS (WHICH WERE ALSO FILED WITH NY STATE BANKING DEPARTMENT)--DESPITE BEING "A MANUFACTURED CRIME" CONCOCTED BY DANY, WERE MITIGATED BY (A) THE FACT [REDACTED] SUBMITTED THEM IN "GOOD FAITH"; (B) THE FACT THAT THEY CONTAINED NO MATERIAL MISREPRESENTATIONS OR OMISSIONS; AND (C) THE FACT THAT NO WITNESS FROM EITHER THE FED OR NYSBD WAS CALLED BY THE PROSECUTION TO SAY THAT EITHER HAD RELIED IN ANY WAY ON THOSE FORMS AS THE BASIS FOR ANY DECISION; (5) THAT THE STATEMENTS OF, AND DOCUMENTS RELATING TO, 19 OF THE 45 PROSECUTION WITNESSES HAD BEEN WRONGFULLY WITHHELD FROM THE DEFENSE UNTIL AFTER COMMENCEMENT OF THE TRIAL; (6) THAT DANY'S CASE WAS "A THEORY IN SEARCH OF FACTS"; "ABSURD"; "A VINDICTIVE PROSECUTION;" AND "A WIN-AT-ALL-COSTS, SHOW-TRIAL." OVER THE PROSECUTION'S OBJECTIONS, THE DEFENSE WAS EVEN ALLOWED TO PLAY ON THE EMOTIONS OF THE JURY, SAYING HOW [REDACTED] LIFE AND REPUTATION, AS WELL AS HIS FAMILY'S, HAD BEEN WRONGLY, EVEN FRAUDULENTLY, RUINED BY THE "MALICIOUS, VINDICTIVE" PROSECUTION DANY HAD BROUGHT.

b6  
b7C

(X)

SSA  
ASAC

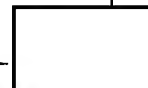


29B-WF-171994 Sub W - 38

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ON 8/9/93, A MEMBER OF DANY ASSISTANT DA [REDACTED] STAFF REPORTED TO WMFO CA THAT, DUE TO A LATE STARTING TIME (11:30 A.M.) ON 8/9, THE PROSECUTION'S SUMMATION WOULD PROBABLY CONTINUE UNTIL AT LEAST MIDDAY, 8/10/93.

b6  
b7C

ON 8/10/93, WHEN CONTACTED BY WMFO CA, CROSS-DESIGNATED SPECIAL ADA (DOJ FRAUD SECTION TRIAL ATTORNEY) [REDACTED] VERIFIED THAT THE PROSECUTION'S SUMMATION WOULD LAST UNTIL EARLY AFTERNOON 8/10; AND SPECULATED THAT, ALTHOUGH JUSTICE BRADLEY MIGHT PROCEED IMMEDIATELY INTO CHARGING THE JURY, HE WOULD PROBABLY NOT DO SO UNTIL 8/11. ON THE SUBJECT OF CHARGES, SADA [REDACTED] NOTED THAT JUSTICE BRADLEY HAS INFORMED BOTH SIDES THAT, BASED ON THE ROSARIO CASE (A NY CASE ANALAGOUS TO THE U.S. JENCKS ACT), HE WILL INCLUDE ONE CHARGE REQUESTED BY THE DEFENSE: THAT THE JURY MAY INFER FROM THE PROSECUTION'S WITHHOLDING OF MATERIAL RELATING TO "STATEMENTS" BY 19 OF ITS 45 WITNESSES UNTIL AFTER THE TRIAL HAD BEGUN THAT THE WITHHELD MATERIAL WOULD HAVE BEEN ADVANTAGEOUS TO THE DEFENSE'S CASE AND DELETERIOUS TO THE PROSECUTION'S.

FBI

## TRANSMIT VIA:

☐ Teletype  
☐ Facsimile  
☒ AIRTEL

## PRECEDENCE:

☐ Immediate  
☐ Priority  
☐ Routine

## CLASSIFICATION:

☐ TOP SECRET  
☐ SECRET  
☐ CONFIDENTIAL  
☐ UNCLAS E F T O  
☐ UNCLAS

Date 9/8/93

TO : SAC, MIAMI  
FROM : SAC, WMFO (29B-WF-171994) (P) (C-5)  
SUBJECT : HIDDEN INTERESTS;  
MC #38;  
FIF; FAG;  
(OO: WMFO)

On 9/7/93, WMFO learned from [REDACTED]

## LEADS:

Referral/Consult

MIAMI DIVISION:

At Miami, Florida: will, at U.S. District Court, obtain a copy of the complaint filed by the Republic of Panama in its civil suit against BCCI.

2-MIAMI

1-WMFO (Sub W)

(3)

29B-WF-171994 Sub W-39

SEARCHED	Su	Su
SERIALIZED		
SEP 9 1993		
FBI - WASH. METRO FIELD OFFICE		

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Approved: \_\_\_\_\_ Transmitted \_\_\_\_\_ Per \_\_\_\_\_  
(Number) (Time)

KOSTELANETZ RITHOLZ TIGUE & FINK  
80 PINE STREET  
NEW YORK, N.Y. 10005

TELEPHONE  
(212) 422-4030  
TELECOPY  
(212) 422-0784

February 10, 1994

Agent [redacted]  
Federal Bureau of Investigation  
500 First Street, N.W.  
Suite 400  
Washington, D.C. 20535

Re: [redacted]

Dear Agent [redacted]:

In May 1992, we provided you with original diaries and other records of our client, [redacted] (See, e.g., attached cover letter). Since the investigation of [redacted] has been concluded, we request that you return these original documents to us so that we may forward them to our client.

Thank you for your assistance.

Very truly yours,

[redacted]

LAL:mb  
Enc.

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b7C

-40  
29B-WF-171994 - Sub-W

SEARCHED	INDEXED
SERIALIZED	FILED
FBI - NEW YORK FIELD OFFICE	



U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to  
File No.

1900 Half Street  
Washington D. C. 20535  
March 14, 1994

[redacted]  
Kostelanetz, Ritholz,  
Tigue & Fink  
80 Pine Street  
New York, New York 10005

RE: [redacted] and your letter dated 2/10/94.

Dear [redacted]:

Special Agent [redacted] of our office, has advised me  
that the investigation of [redacted] is continuing.  
Therefore, we are unable to comply with your request of February  
10, 1994.

b6  
b7C

Sincerely,

Anthony E. Daniels  
Assistant Director in Charge

By: [redacted]  
Supervisory Special Agent

1-Addressee  
1-29B-WF-171994 (Main)  
1-29B-WF-171994 Sub W

29B-WF-171994 Sub W  
-41

Searched \_\_\_\_\_  
Serialized Sw  
Indexed \_\_\_\_\_  
Filed Sw

fb

# Memorandum



To : ADIC, WMFO (29B-WF-171994) (P)

Date 8/19/94

SA [redacted] (C-5)

Subject: HIDDEN INTERESTS;  
MC #38;  
FIF; FAG;  
OO: WMFO

The attached memorandum was received 8/18/94 from DOJ Fraud Section Trial Attorney [redacted]

b6  
b7C

The New York Times reported in a recent editorial that CLARK CLIFFORD and ROBERT ALTMAN visited someone in the White House on 12/7/93. TA [redacted] and I believe we should determine who they visited and why.

Thus far, I have determined that the U.S. Secret Service White House Pass Office only keeps computerized records of visitors for a month before turning them over to the White House Records Management Section, [redacted] Room 80, Old Executive Office Building, telephone (202)456-2240.

Appropriate authorization will be obtained prior to any White House contact, and you will be kept apprised.

①-WMFO (At. 1)

(1)

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